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March 17, 1998

David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

***In Re: BellSouth Telecommunications, Inc.'s Entry Into Long Distance  
(InterLATA) Service in Tennessee Pursuant to Section 271 of  
the Telecommunications Act of 1997 – Dkt. 97-00309***

Dear Mr. Waddell:

Please find enclosed for filing the original and 13 copies of AT&T's Responses to the Consumer Advocate's Discovery Requests in the above-referenced docket. All responses were provided by Sharon E. Norris, District Manager, AT&T Law & Government Affairs, with the assistance of internal business support managers.

Please note that AT&T has provided an Affidavit of Ms. Norris to protect certain confidential information provided in our response to Data Request No. 1(d). The confidential information has been highlighted in each of the respective copies of the response in accordance with procedures outlined in the Protective Order entered in this docket.

Very truly yours,

BEFORE THE  
TENNESSEE REGULATORY AUTHORITY

Nashville, Tennessee

In Re

BellSouth Telecommunications, Inc.'s Entry	)	
Into Long Distance (InterLATA) Service	)	Dkt. No. 97-00309
in Tennessee Pursuant to Section 271	)	
of the Telecommunications Act of 1996	)	

**RESPONSE OF AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC.  
TO THE CONSUMER ADVOCATE'S FIRST DISCOVERY REQUESTS**

AT&T Communications of the South Central States, Inc. ("AT&T") hereby submits the following responses to the Consumer Advocate's First Discovery Requests in the above-captioned proceeding.

1. For each service area in Tennessee identify:

- (a) the number of residential customers served by the company's own facilities.

**AT&T Response:**

None.

- (b) the number of residential customers served by resale of BellSouth service.

**AT&T Response:**

None.

- (c) the number of residential customers service by use of BellSouth unbundled network

**AT&T Response:**

None.



orders were rejected.

- ii. use of AT&T's own facilities, and

**AT&T Response:**

N/A

- iii. AT&T's resale of BellSouth's service.

**AT&T Response:**

Following are the results reported by BellSouth and by AT&T regarding the period of time between AT&T's submission of an order to BellSouth and the return of a notice of error or "rejection".

BellSouth reported results: Measurement-- the % of rejection notices returned within one hour as required by the AT&T / BellSouth interconnection agreement.	Additional AT&T measurement-- Average interval between submission of an order and return of rejection notice
November, 1997—16.10%	November Week 1 36.4 hours Week 2 165.8 hours Week 3 61 hours Week 4 151.9 hours
December, 1997--- 8.73%	December Week 1 214.2 hours Week 2 152.02 hours Week 3 28.30 hours Week 4 73.95 hours
January, 1998----- 28.89%	January Week 1 50.05 hours Week 2 75.72 hours Week 3 74.66 hours Week 4 84.98 hours

3. Provide copies of any analysis, reports, and/or correspondence provided to AT&T by BellSouth concerning the number and type of error made by AT&T employees that resulted in rejection of the AT&T's orders.

**AT&T's Response:**

See Attachment 1 for correspondence between AT&T and BellSouth regarding errors.

4. In response to Item 11 of the Consumer Advocate Division's first discovery request BellSouth responded in part:

Once an order is pending in the Service Order Control Systems (SOCS), certain situations can arise that result in a "jeopardy" condition. A jeopardy occurs when it appears that the previously established due date for the Once an order is pending in the Service Order Control System (SOCS), certain order may not or will not be met. Jeopardy notifications, often called "jeopardies," therefore advise CLECs when an order is not expected to be completed by the due date. BellSouth currently notifies CLECs of service jeopardies primarily by telephone, and less frequently, by facsimile, which is substantially the same time and manner it does for itself.

- (a.) Does AT&T agree with BellSouth's response? If not, please explain. Please be specific and provide any available documentation to support your position.

**AT&T Response:**

AT&T agrees with BellSouth's definition of a jeopardy. However, AT&T has concerns with BellSouth's response. BellSouth accurately states that it currently notifies CLECs of service jeopardies primarily by telephone, and less frequently, by facsimile. BellSouth claimed in 1997 that it had built an electronic notification jeopardy capability, but has since retracted that claim. During the period of that claim, AT&T never received any electronic notification of jeopardies, and BellSouth could not demonstrate that it could or ever had sent any actual jeopardy reports to AT&T. Regarding BellSouth's treatment of its own jeopardies, whenever a BellSouth department determines that a jeopardy condition exists before a due date, the existence of that condition is electronically posted to the pending order in SOCS where it is available for viewing by any interested party. The real issue is parity. How soon after the determination of a possible service jeopardy is the pending order in SOCS updated to reflect the changed status, and how does that compare to the speed with which CLECs are notified of a jeopardy status to their orders?

- (b.) Provide copies of all analysis in AT&T's possession concerning the number of or percent of times BellSouth meets and the number of or per cent of times BellSouth fails to meet the initial established due date. If available provide the breakdown as following service categories.
- i. AT&T's use of BellSouth's unbundled network elements,

**AT&T Response:**

Of AT&T's 74 test orders for UNE combinations in Florida, Kentucky, and Tennessee, only 43% of the orders were completed on time.

- ii. use of AT&T's own facilities, and

**AT&T Response:**

N/A

**AT&T Response:**

- iii. AT&T's resale of BellSouth's service.

Attachment 2 contains reports which provide the percent of the time that BellSouth did not meet AT&T's requested due date and the number of times it did not meet its own committed due date. This report is for resold services in Georgia.

- 5. Provide all analysis in AT&T's possession concerning the amount of time that AT&T's customers are out of service during cut over from BellSouth, where service is being furnished by:

- i. AT&T's use of BellSouth's unbundled network elements,

**AT&T Response:**

Not applicable

- ii. use of AT&T's own facilities, and

**AT&T Response:**

Not applicable

- iii. AT&T's resale of BellSouth's service.

**AT&T Response:**

Many of AT&T's resale customer's experienced a service disruption when migrating from BellSouth to AT&T. See Attachment 3 for a complete description of the problem. In Docket No. 8354-U in Georgia, following a workshop on Operational Support Systems (OSS), the Georgia Public Service Commission Staff proposed, and BellSouth agreed to install software by January 12, 1998, to resolve this issue. BellSouth, however, has since indicated to AT&T that it did not find any problem that needed to be resolved. Thus, while all of the workshop participants recognized that a problem existed, it is not clear whether BellSouth has implemented the proposed solution.

6. In response to the Consumer Advocate's First Discovery Request Item 3, BellSouth responded:

See Response to Item 2. BellSouth reiterates that it has supplied information regarding submission of orders via the EDI interface in the Local Exchange Order (LEO) Guidelines. The current edition has been available to CLECs for at least 6 months, but the first edition was made available in April, 1997. The LEO Guide was attached to the Direct Testimony of Glorinda Calhoun as Exhibit GC-26 and to the Affidavit of William Stacy as Exhibit WNS-45. While BellSouth had previously provided much of this information (most of it is contained in the LEO Guide), on January 30, 1998, a comprehensive package of edits (including the Local Exchange Ordering (LEO) and Local Exchange Service Order Generator (LESOG) edits and Rejects requirements, and a disk of the Service Order Edit Routine (SOER) edits used by the Service Order Control System (SOCS) was delivered to CLECs and notice of the availability of these edits was put on BellSouth's CLEC web site.

Regarding the subject of "flow-through," attached is the January flow-through report. This report shows the flow-through rate of all CLECs using LENS or EDI for electronic ordering for the month of January 1998. "Raw flow-through" includes orders rejected for errors, and of which are CLEC input errors.

Adjusted flow-through" excluded rejected orders, and shows what the systems are capable of flowing through mechanically. Also attached are CLEC order errors analyses, showing the types of order errors observed during an examination of every electronic order placed for three days in November and September.

The January flow-through report shows that two CLECs, CLECs L and P, which placed 659 and 332 orders respectively electronically in January alone, achieved non-adjusted flow-through rates of 98.0% and 96%, showing that high flow-through with trained service representatives is indeed quite possible using the electronic interfaces BellSouth provides for CLECs. This report's results indicate that January's raw, non-adjusted flow-through rate was 63.3%, a 150% improvement over July's raw flow-through rate of 25%. When January's 63.6% raw flow-through is adjusted for the CLEC-caused order errors, which were 80.1%, the adjusted flow-through rate for January is 90.5%. this rate is comparable to the combined retail flow-through rates for residence and business orders.

The second set of documents attached in response to this Request reflect that BellSouth conducted analyses of order flow-through and error which caused orders to be rejected taking a sample of all electronic orders placed during 1 day in September and 2 days in November, to examine each order to determine which errors are indeed CLEC order errors and BellSouth's system errors. The report validate that CLECs' order error

rates ranged from 27% to 88%, also indicating that lower error rates are indeed achievable. November's analysis of electronic order errors shows that SOER (edits used by SOCS) errors accounted for 45% of the CLEC's errors. These SOER errors include many omitted or incorrect USOCs on the service order. This is in spite of the fact that BellSouth has provided CLECs the required USOCs in the Local Exchange Ordering Guide, Volumes 2 and 3, which CLECs have had since April 1997, and again in BellSouth's CLEC web site. Another error is improper formatting of data on the service order (no space after a comma, for example). As earlier stated earlier, this information also was provided in the three-volume Local Exchange Ordering Guide. The second largest CLEC error category was address errors, which accounted for 26.7% of the CLEC errors. BellSouth has provided CLECs the information they need to perform correct order processing, as demonstrated by the two CLECs mentioned earlier, who are achieving non-adjusted flow-through rates of 98% and 96%.

BellSouth also provide ongoing assistance to CLECs to help them decrease their order errors and rejects, and therefore increase their order flow-through. BellSouth continues to conduct regularly scheduled training classes on the Electronic Interfaces – BellSouth trained 383 CLEC attendees in 1997's Electronic Interfaces classes. In addition to the documentation previously listed, BellSouth has provided the LENS User Guide, the Trouble Analysis Facilitation Interface (TAFI) User Guide, the EDI\_PC Harbinger Training Manual, as well as specifications for CGI-LENS and TAFI. BellSouth also provides a team of people who can provide on-site assistance to CLECs upon request (at their locations), to help them with their use and understanding of the Electronic Interfaces. Finally, BellSouth has provided to the CLECs electronic access to USOCs, as well as the Rejects Requirements binder developed by BellSouth and agreed upon by the CLEC EDI users.

- (a.) Does AT&T agree with BellSouth's response? If not explain. Please be specific and provide supporting documentation.

### **AT&T Response**

#### **A. LEO Guides**

The LEO Guides are neither adequate nor an accurate source for providing CLECs the totality of information needed to prevent errors in service orders. First, the LEO guides are inadequate. They do not contain many of the business rules necessary to determine the edits present in BellSouth's systems. In its response, BellSouth admits it finally provided additional information on January 30, 1998. Secondly, the LEO guides are frequently inaccurate. They are not been updated in a timely manner and have been replete with errors. Examples of the types of problems faced by CLECs are:



- BellSouth has stated that the LEO Guide has been available since December 31, 1997, and that an AT&T specific Guide was produced on December 15, 1997.
- The April Version was referred to as Issue 3, but in fact was the 5<sup>th</sup> version published between December 1997 and April 1998.
- The July Version (Issue 4) which BellSouth claims has been in effect since then was significantly modified in October 1998, with whole new sections and replacements for sections. The updated pages continued to reflect their publication date as July and their issue as being Issue 4 and contained no update markings.
- Recently Volume 3 of the LEO Guide (which currently runs one "issue" behind Volumes 1 and 2) was updated to Issue 3. However, the very next day several pages were added or replaced the new and replacement pages show the same publication date and issue number as the originals and contained no revision markings. The initial WEB page release of this document was labeled as Issue 4 rather than Issue 3, and had different content than the release now posted on the WEB as Issue 3, but dated as January 1997.

The complete lack of change control processes these situations reflect continue to make the content of the document subject to concern. (See Attachment 4 for documentation regarding AT&T's communication with BellSouth regarding additional problems with errors in the content of its LEO Guides.) AT&T also disputes BellSouth's assertion that it has now provided all necessary information for CLECs to avoid errors. Attachment 5 is a March 9, 1998 letter from AT&T to BellSouth regarding BellSouth's continuing failure to provide Directory Listings business rules. In summary, any user guide, technical specification, etc, only provides information for a snapshot in time, and becomes obsolete as soon as changes occur. A change management process must be in place to ensure the orderly introduction of new information and processes takes place. Presently, BellSouth and interested CLECs are meeting to develop such a process. A change management process, however, does not exist at this time.

#### B. Flow-Through Reports

The January flow-through report provided by BellSouth contains multiple errors. Moreover, the data in the report demonstrates that most orders involve some degree of manual processing. For example, of the 26,107 service orders submitted by CLECs in January 1998, only 32.3 percent (i.e., 8428 orders) did not involve human intervention. The FCC has found that such excessive reliance on manual processing does not satisfy the requirements of the Act. FCC Order 97-418 ¶ 104-14.

BellSouth argues that the January 1998 flow-through reports shows that "high flow-through with trained service representatives is indeed quite possible using the electronic interfaces BellSouth provides for CLECs."

Item 2, at 2. BellSouth relies on the experience of "CLEC L" and "CLEC P" for this conclusion. BellSouth's logic in arriving at that conclusion, however, is flawed in a number of aspects. First, BellSouth presented no evidence to support the inferences that: (a) the service representatives of CLEC L and CLEC P are better trained than the service representatives of any other CLEC; and (b) the training of service representatives of CLEC L and CLEC P was the sole cause of their relatively high flow-through rate experience. While training has some impact on flow-through rates, the make-up of the types of orders submitted most likely has a larger impact on flow-through rates. For example, a CLEC that submits predominantly "switch-as-is" orders through LENS is likely to experience relatively high flow-through rates because there is little that could possibly go wrong with that transaction. On the other hand, CLECs submitting the full range of available EDI order types are more likely to experience relatively low flow-through rates because, among other things, the EDI ordering interface is not integrated with a pre-ordering interface.

Second, CLEC L and CLEC P experienced these flow-through rates using LENS, which BellSouth does not contend is a non-discriminatory ordering interface. Achieving high flow-through rates on a discriminatory ordering interface is not particularly noteworthy. Interestingly, CLECs using the industry standard EDI interface (which BellSouth claims is non-discriminatory) collectively experienced a raw flow-through rate of only 56.7%.

Third, the raw flow-through rates for CLEC L and CLEC P are significantly lower (65.2% and 37.2% respectively) if you examine the flow through for all submitted orders. CLEC L and CLEC P (like many other CLECs) each submitted a significant number of orders via FAX or mail instead of LENS. Why? One likely reason is that the limited functionality of LENS often makes a completely manual process (such as mail or FAX) more attractive to CLECs. In addition, BellSouth's own actions will cause additional manual orders. For example, BellSouth has advised AT&T that the ordering of UNE combinations will remain a manual process. (See Attachment 6).

#### C. Error Analysis

Further, many of the errors that BellSouth labels as "CLEC" errors are attributable to BellSouth's failure to provide adequate information. "SOER Order Error" and "RSAG" or street address errors constitute approximately 72% of "CLEC" errors according to the BellSouth report. AT&T anticipates that SOER Order Errors will decrease in the future as CLECs incorporate the SOER edits received on January 30, 1998 into their processes. If BellSouth at some point in the future provides CLECs with the technical data necessary to integrate LENS pre-ordering with EDI ordering, and develops the Applications Programming Interface (API), which is an integrated pre-ordering and ordering interface, rejection rates should also improve. By integrating pre-ordering functions with ordering

functions, CLECs will be able to populate service orders automatically with addresses obtained from RSAG, thereby greatly reducing the number of "RSAG" errors.

Additionally the new pre-ordering interface implemented by BellSouth for AT&T, EC-Lite, currently does not provide an RSAG-valid address. Without an RSAG-valid address, AT&T cannot submit an order successfully.

AT&T's experience with the LEO Guide is detailed earlier in this response. Additional examples of poor performance by BellSouth include:

- BellSouth recently created a new inquiry option in the LENS pre-ordering interface, but apparently did not update the so-called LENS CGI specification. In addition, BellSouth did not update the LENS User's Guide until a month after the change.
- BellSouth's letter attached to its response notifying CLECs of Release 2.0 of LENS and EDI. There are no updates to the CGI specifications for LENS and training will not be available until 10 working days before implementation. For EDI-PC, details and training "will follow." Further, AT&T has been advised that its EDI-PC certification must be placed on hold until the version 2.0 update is completed. (See Attachment 7)

7. In response to Consumer Advocate Division first discovery request Item 6 (First), Bell responded:

The CLECs have requested that notification of rejected orders be delivered to them via EDI, and BellSouth began implementing electronic notification in November 1997, as described below. There currently are no industry standards for providing electronic reject or error notification. BellSouth's current EDI implementation complies with the national standards established by the industry's Ordering and Billing Forum in TCIF version 6.0. However, neither this version-nor version 7.0, which is scheduled to be implemented on March 16, 1998—provides standards for returning information to the CLEC for orders rejected because of errors detected by LEO, LESOG, or SOCS. Despite the lack of industry standards, BellSouth has already developed and implemented the first of a two-stage process to provide error rejection electronically. This mechanism returns an error code and an explanation of the error to CLECs using the EDI interface. This initial stage of this automated reject capability, which was tested by MCI, became operational in November 1997. This stage contains 68 percent of the total electronic rejects to be implemented. The remaining error types are being addressed in the second phase of this implementation. To facilitate (sic) this development in the absence of industry standards, BellSouth hosted a conference on October 30 and 31, 1997 for all CLECs using EDI. This conference was necessary because of the nature of EDI, which requires complementary

programming on both BellSouth's and the CLECs' side of the EDI interface. The CLECs and BellSouth agreed on the specifications required for the remaining capability which all parties would implement on their respective sides of the EDI interface. The second phase of the reject capability is currently schedule to be operational on March 16, 1998. Until the second phase is implemented, rejects not included in the 68 percent of error types currently handled by EDI are routed to the Local Carrier Service Center, where they can be corrected by the LCSC or faxed to the CLECs if necessary....

- (a.) Has AT&T agreed to the specifications required for the remaining capability will implement on their respective sides of the EDI interface?

**AT&T Response:**

Yes, AT&T has agreed to the specifications for the rejections that BellSouth has agreed to return electronically.

- (b.) Has AT&T tested the initial stage?

**AT&T Response:**

No. AT&T is testing all the electronic rejections that BellSouth is planning to provide as part of its upgrade to TCIF Version 7 currently scheduled to be implemented on March 16, 1998.

- (c.) If AT&T is using this initial stage, give the date that AT&T's use began.

**AT&T Response:**

Not applicable.

- (d.) If AT&T is not using the initial stage, please explain.

**AT&T Response:**

AT&T is not using the initial stage because BellSouth did not make the initial stage available for the version of EDI that AT&T is using.

- (e.) Does AT&T plan to begin using the final stage on March 16, 1998? If not please explain.

**AT&T Response:**

AT&T plans to use all the edits provided in the initial and final stages effective with its implementation of TCIF Issue 7, now scheduled to begin on March 16, 1998.

- (f.) Please identify any statements made by BellSouth in this response with which AT&T disagrees.

AT&T does not disagree with BellSouth's comments in this response. However, additional information which AT&T believes the CAD will find useful is:

- The electronic rejections being implemented in March, 1998, represent only a small portion of the total rejections that need to be made electronic. Virtually all of the SOER edits, for which the CLECs received almost 2000 pages of documentation on January 30, 1998, do not have electronic rejection capability. BellSouth's use of 68% in their response above does not mean that 68% of all errors were programmed to be returned electronically; it only means that 68% of the 239 errors planned to be programmed for electronic transmission were completed. If each of the 2000 pages of SOER edits only had one edit per page, there would still be approximately 2000 additional errors to be made electronic, or approximately 90% that remain manual.
- BellSouth is obligated to provide parity treatment, regardless of whether or not an industry standard currently exists.
- BellSouth was obligated in its interconnection agreement with AT&T to provide rejections electronically by March, 1997, but has refused for one year to do so.

8. In response to Item 7 of the Consumer Advocate Division's first discovery request BellSouth stated:

(a) BellSouth object to this request as phrased. BellSouth does not believe there are any deficiencies. Subject to this objection, BellSouth has and does provide CLECs with mechanized firm order confirmations (FOCs), but it **does not** have a corresponding process for its own retail operations. An FOC is the CLEC's assurance that its order has successfully passed through the various edits and formatting checks in LEO, LESOG, and SOCs, and that the order is pending in SOCS. A completion notice (CN) is provided to a CLEC after a service order has been posted as "complete" in SOCS. BellSouth **does not** have a corresponding process for itself. For information regarding rejection and jeopardy notification, please see BellSouth's response to Data Request nos. 5, 6 (First), 10, and 11. Also, see BellSouth's response to nos. 8, 9, 12, and 13. (Emphasis provided.)

Does AT&T agree with BellSouth's response? If not, please explain. Please be specific and provide as supporting documentation.

**AT&T Response:**

No. BellSouth seems to be indicating that it has no corresponding "assurance that its order has successfully passed through the various edits and formatting checks in SOCS, and that the order is pending in SOCS," or that it has no corresponding information that indicates that "a service order has been posted as 'complete' in SOCS". Obviously BellSouth personnel are aware, through systems and/or process access and feedback, of the status of service orders in each stage from creation to completion. Moreover, AT&T believes there exist appropriate corresponding BellSouth processes. For example, a useful comparison could result from data reflecting: How quickly after the appropriate transaction (i.e., order submission, order completion) do BellSouth personnel have access to information regarding the following? Also useful is data on:

- (1) Whether or not an order has passed SOCS edits and is in pending status?  
and
- (2) Whether and when an order has been completed?

9. In response to Item 15 of the Consumer Advocate Division's first discovery request BellSouth stated:

In response to Item no. 14, BellSouth admitted that it does not integrate the LENS pre-ordering and the EDI ordering interfaces for CLECs. Integration of the pre-ordering interfaces is the responsibility of each CLEC, if it desires integration; it is not BellSouth's responsibility. However, since the time of the Louisiana filing, and updated GCI specification for LENS has been made available to interested CLECs. The EC-LITE machine-to-machine pre-ordering interface, which may also be integrated with EDI, became available on December 31, 1997.

- (a.) Does AT&T agree with this response? If not, please explain. Please be specific and provide supporting documentation.

**AT&T Response:**

In its Interconnection Order, the FCC found that "nondiscriminatory access [to OSS] necessarily includes access to the functionality of any internal gateway systems the incumbent employs in performing [OSS functions] for its own customers." 61 Fed. Reg. 454876, 45530-31, at paragraph 355. BellSouth's internal gateway systems, such as RNS, integrates pre-ordering and ordering. Consequently, BellSouth must provide access to an integrated OSS or, at the very least, OSS that are integratable. In its order rejecting BellSouth's 271 application for South Carolina, the FCC did not decide whether BellSouth must provide integrated OSS because that issue was not before the FCC. FCC Order 97-418, ¶ 160. Rather, the issue before the FCC was whether BellSouth's efforts to make its OSS interfaces integratable were sufficient. *Id.* The FCC found that BellSouth's OSS interfaces were not integratable and that was one reason why the FCC rejected BellSouth's 271 application. FCC Order 97-418 ¶ 155.

BellSouth has not yet provided an integrated or integratable interface that is non-discriminatory. To be integratable, an interface must be application-to-application, make effective use of standards, and have been implemented based on the specifications agreed to by the trading partner(s).

The specifications for LENS are not current, nor are they application-to-application, and are therefore not a viable option for integration. For example, BellSouth recently created a new inquiry option in the LENS pre-ordering interface, but apparently did not update the so-called LENS CGI specification. Importantly, BellSouth provided an HTML parsing specification instead of a CGI specification. The FCC has found that HTML parsing does not provide equivalent access. FCC Order 97-418 ¶¶ 152, 162-63.

BellSouth claims that EC-Lite (which is a machine-to-machine pre-ordering interface) became available to CLECs on December 31, 1997. That claim, however, is not accurate because EC-Lite does not provide users with an RSAG-valid address. Without an RSAG-valid address, a CLEC cannot submit an order successfully. EC-Lite cannot be considered available if it does not provide the information necessary to submit an order successfully. EC-Lite, moreover, does not provide access to product and services information. While AT&T has chosen to obtain such information through another means, that may not be a viable option to other CLECs. Furthermore, EC-Lite has some of the same deficiencies as LENS. For example, EC-Lite does not provide calculate due dates using the same equation that BellSouth uses to calculate due dates for its customers, it does not allow CLECs to reserve due dates, and does not parse customer service record information. Certainly, the machine-to-machine capability of EC-Lite provides better functionality than LENS, but it does not provide nondiscriminatory access to BellSouth's pre-ordering functions.

- (b.) Has AT&T integration of its pre-ordering interfaces? If not, please explain.

**AT&T Response:**

AT&T has integrated EC-Lite with its own national pre-ordering architecture. It has not yet integrated its EC-Lite with its EDI ordering interface. As BellSouth indicated, EC-Lite became available on December 31, 1997. AT&T is reviewing the feasibility of incurring this integration expense at this time in a market "entry" environment where BellSouth has failed to offer non-discriminatory access to essential operating support systems ("OSS") and has taken other actions which have increased AT&T's costs to the point that resale is not a profitable market entry strategy. BellSouth also has frustrated AT&T's ability to use the other entry vehicle contemplated by the 1996 Telecommunications Act, unbundled network elements, as a means of offering broad-based competitive local telephone exchange services. Additionally, BellSouth's unwillingness to comply with the explicit obligations imposed by the Act and the Federal Communications Commission's implementing regulations and orders has created massive roadblocks and effectively frustrated AT&T's entry plans in Tennessee and elsewhere. BellSouth has systematically and consistently refused to make combinations of unbundled network elements available on the terms and

conditions required by the Act. For example, by adopting a policy which requires AT&T to purchase collocation before AT&T may use combinations of network elements, BellSouth has created an enormous barrier to AT&T's ability to provide service in Tennessee using unbundled network elements.

10. Provide any analysis of the length of time between being notified by BellSouth that it will not be able to accomplish the cut over and the scheduled cut over date.

**AT&T Response:**

AT&T assumes this question is related to provision of unbundled loops and the associated local number portability. AT&T has not ordered unbundled loops from BellSouth

11. Provide any analysis that shows the number of times/frequency of customers service being disconnected by BellSouth and you not being able to provide service to the customer due to BellSouth's problems. (Provide supporting documentation.)

**AT&T Response:**

Please see response in Item 10 above. Additionally, please see AT&T's response to Request No. 5 for AT&T's experience with customer outages in the resale environment.

Dated this 17<sup>th</sup> day of March, 1998.



**CERTIFICATE OF SERVICE**

I, James P. Lamoureux, hereby certify that on this 17h day of March, 1998, a true and correct copy of the foregoing has been delivered via U. S. Mail, postage prepaid to the following counsel of record:

  
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BEFORE THE TENNESSEE REGULATORY AUTHORITY

In Re: **BellSouth Telecommunications, Inc.'s Entry Into Long Distance (InterLATA) Service in Tennessee Pursuant to Section 274 of the Telecommunications Act of 1996**

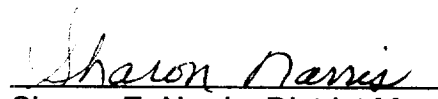
**STATE OF GEORGIA  
COUNTY OF FULTON**

**COMES NOW** Sharon E. Norris, after being duly sworn and states that:

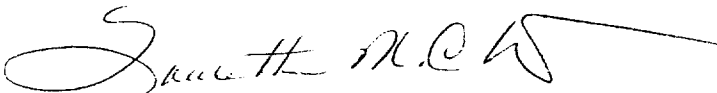
She represents AT&T, and that the attached responses to the Consumer Advocate's First Discovery Request of AT&T contain certain Proprietary Confidential Information as defined in the Protective Order in this case dated February 25, 1998. This information reflects certain business operations of AT&T, the disclosure of which could harm AT&T's competitive position.

Affiant further declares that any unauthorized disclosure of the Proprietary Confidential Information will be treated as a violation of that Order.

Executed this 16th day of March, 1998.

  
Sharon E. Norris, District Mgr.  
AT&T Law & Govt. Affairs

SWORN TO AND SUBSCRIBED BEFORE ME  
this 16th day of March 1998.

  
Notary Public

Notary Public, Fayette County Georgia  
My Commission Expires September 23, 2001

Attachment 1  
TRA Docket 97-00309  
AT&T Response to  
Consumer Advocate Division's  
Second Discovery Request

Request: Provide copies of any analysis, report,  
and/or correspondence provided to AT&T by BellSouth  
concerning the type and number of errors made by  
AT&T employees that resulted in rejection of AT&T's orders.

FEB 27 1998

380

BellSouth Interconnection Services  
Suite 200  
1900 West Exchange Place  
Tucker, Georgia 30084

770 492-7560  
Fax 770 621-0629

Quinton E. Sanders  
Sales - Assistant Vice President  
AT&T Regional Account Team

February 26, 1998

William J. Carroll  
Vice President, AT&T  
Room 4170  
1200 Peachtree St., N.E.  
Atlanta, GA 30309

Dear Jim:

The purpose of this letter is to address the concerns you raised in your February 19, 1998 letter to Elton King. As I'm sure you're aware, there are over 300 CLECs operating in BellSouth territory, and the majority of our resources are shared among these CLECs. However, AT&T does have dedicated support through the AT&T Account Team and the AT&T ACAC. Let me highlight the effort that your Account Team has demonstrated in raising awareness within BellSouth of the importance to AT&T of the AT&T Digital Link product offering. In the last eight months, BellSouth spent a tremendous amount of time and resources educating the downstream support organizations about your number portability product offering and RI-PH. AT&T is the only CLEC currently using the RI-PH platform. In addition, we have spent an untold number of hours consulting with and supporting AT&T throughout its various iterations of the Digital Link product offering.

Using the points that you outlined in your letter, let me respond to your concerns regarding the trunking orders, tie down information, special assembly, billing and address verification situations. As a significant point, BellSouth personnel are not in the habit of placing "blame" when orders from customers cannot be worked because of a problem with the information supplied on the order. As you are aware, we work thousands of orders per month for AT&T's special access. Over 20% of these orders have "fatal" errors that our service representatives correct and send on through the downstream systems, using the concept that the end user customer should not be inconvenienced. I can assure you that the customer service concept in the local arena is exactly the same. Also, you are well aware that we must have consistently accurate orders. Let me add that, due to the intricacy of designing

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interoffice trunking, it is sometimes impossible to provide a "comprehensive look" at the order, as you suggested, to facilitate one supplemental order to correct every item. The "knee jerk" reaction you refer to in your letter is an inaccurate characterization of BellSouth's handling of AT&T orders. In fact, our downstream support personnel were surprised that simple "fields" on the orders were incorrect (Traffic Type, as an example) since these orders came from the same provisioning center personnel that send all of the interoffice trunking orders for the BellSouth region (in routine switched access provisioning). BellSouth's concern regarding these simple inaccuracies in the AT&T orders caused BellSouth to alert the AT&T people early, so that subsequent orders could be corrected and possibly "flow through" our systems. Correct orders will allow AT&T's requested due dates to have a realistic chance of being met. Orders (ultimately corrected by BellSouth) were finalized on February 12, 1998, which was your original due date for final test and turn-up from us in Florida.

Regarding the missed Firm Order Confirmations and Due Dates on the Florida Trunk Orders, as soon as the Account Team learned of the scope of the trunking orders in mid December, the appropriate resources were identified to manage each state's orders as a "Project". Even though the number of trunks and facilities needed does not qualify (on magnitude and volume) strictly as a project, due to BellSouth's understanding of the importance of Digital Link to AT&T, an overall coordinator between all departments was assigned. Let me emphasize that no ASR's had been received at that time for trunking. The AT&T contact (Sheila Wilson) had sent some spreadsheets via e-mail that provided general information about the offices, the number of trunks, and the desired due dates. As you know, there are several types of trunk groups involved, some of which carry only specific traffic types in one direction.

On January 20, 1998, BellSouth recognized that the point code for the 4E machine was a concern, since our inventory system will not complete the design of a circuit and create routing information for necessary databases without a discrete point code per office. Since the 4E is recognized in our systems as a Toll Switch, the separate "local" CLLI code was not compatible with the Toll point code. BellSouth had previously, in 1997, advised AT&T that a separate "local" CLLI would be necessary for the 4E switches, and AT&T secured the CLLI codes for the affected offices. On January 23, in a face to face meeting with Sheila Wilson, she advised that AT&T would not take the next steps to procure "local" point codes to work with the already

William J. Carroll

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established "local" CLLI codes. At this point, Ms. Wilson was advised that the orders would be on hold until the point code situation could be resolved. AT&T personnel would not or could not explain to BellSouth why a separate point code for the "local" functionality of the 4E machine was out of the question. Bellcore has since advised our subject matter experts that AT&T could have secured point codes in less than 10 days. All other CLEC's who require this type of network architecture provide a separate and unique point code for their local switches.

During the two weeks following the January 23rd meeting and because of AT&T's uncooperative stance, several solutions were explored. Some solutions were not workable when tested with our support people. As BellSouth continued to develop alternate solutions, BellSouth was also escalating the issues internally. Even in the face of an unreasonable AT&T position, the BellSouth staff devised a workaround involving complex translations. Due to long term maintenance issues and problems generally encountered with non-standard processes, BellSouth is reluctant to make these kinds of "workarounds" a universal practice. Jim, with your network experience, I am sure that you can understand our position on this situation.

As you know, the Georgia Trunking is installed and working. In fact, your testing contact gave us the results of his end to end AMA testing last week. BellSouth spent several hours with him during the week of February 2, when, unknown to him, the AT&T facilities were not complete, and several more hours during the week of February 9, when his facilities were fully functional. The Georgia call through testing was flawless.

At the time your letter was written, your internal personnel could have told you that they have FOC's reflecting a February 27 Due Date for your trunking in Florida. The two week discrepancy from your originally requested due date can be tracked directly to the elapsed time in attempting to negotiate a point code solution and develop a workaround. The problems encountered because of AT&T's refusal to cooperate regarding the point codes could not have been anticipated. Additionally, on February 26, during preliminary testing, BellSouth discovered the AT&T facilities in Florida were improperly designed and could not be used for turn-up on the February 27 due date. AT&T was notified early in the morning of this problem, and at this point, BellSouth continues to await AT&T's redesign of their facilities. The improperly designed AT&T facilities have added further delay in meeting your desired due date.

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Almost within hours of resolving the immediate point code issue, AT&T refused to supply "tie down" information in response to BellSouth's ASRs. Again, other CLECs, when acting as the Access Provider, give the frame location and tie down information. So, therefore, AT&T's behavior is not standard. Your letter seems to assume that there was an "agreement" on the entire region regarding tie downs, and that subsequent orders reflected "incorrect" tie down information. In Georgia, a trial site was used for designation of certain spans where AT&T could "tie down" on the reciprocal trunk orders. We are mindful of the fact that these are the trunks BellSouth orders from AT&T. Typically the Access Provider (AT&T in this case) provides the tie down information. Your mention of the "significant time our collective employees spent" in solving this problem in Georgia was surprising. To my knowledge, BellSouth's Circuit Capacity Management staff members conceived the idea and suggested a trial. The idea that BellSouth might not "execute correctly" in other states was not applicable as AT&T Digital Link testing moved into other states, as it was BellSouth's understanding that AT&T would be able to execute and provide tie down locations appropriately. Indeed, as late as Friday, February 20, BellSouth was working to provide a short term solution to be utilized for select locations in Florida, North Carolina and Tennessee so the AT&T Digital Link testing could move forward. In other locations, or when "live" customers begin to use this service, we will expect AT&T to provide appropriate tie down information.

I very much regret that there was confusion over the Special Assembly situation. I believe that all parties have failed to utilize clear and concise communications when dealing with this issue. As I understand the situation, after the Core Team meeting yesterday, the parties are back on track.

BellSouth shares your frustration with the 8YY situation. Again, this appears to be an issue where AT&T has no negotiating room. A recent letter from AT&T seems to proclaim that a "new day" is here on billing; however, BellSouth has to operate with the rules and guidelines set up by organizations who govern the industry. Also, several positive solutions have been proposed by BellSouth, e.g., to use the 5E switches already resident in your network, or to "loop around" via CAMA trunks as do many of the Independent Companies (who interconnect with BellSouth) and other incumbent local carriers. Our team has been at the table proposing creative as well as standard processes to alleviate the issue; AT&T has said no to all. Jim, BellSouth would welcome the opportunity to come to a joint, equitable solution. I look forward to hearing from you on this issue with a proposal.



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Finally, the issue of Zip Codes on orders has not been fully explored by our working teams, and frankly, I am surprised to see this issue in your letter. The Interconnection Agreement outlines the address verification systems to be used for ordering and preordering purposes. However, if your staff members have identified process problems that are valid concerns, and not simply anecdotal scenarios regarding the most recent Zip Code changes in north Fulton County, please document them and send them over to the Account Team as soon as possible.

The BST project managers working on the AT&T Digital Link offering are trusted, knowledgeable employees of BellSouth and are anxious to work with your personnel. These employees are meeting at least twice weekly in a formal manner. It seems that a vast majority of the issues that are escalated to higher levels could have been avoided if the representatives from the two companies had effectively communicated with each other. You have my commitment to continue to stress to BellSouth employees interfacing with AT&T personnel the utmost importance of clear and concise communications. I will expect each of the BellSouth employees to make such communications a personal goal and to expect no less from their AT&T counterparts. I look forward to talking with you as we work toward a successful launch of this important product for AT&T.

Yours truly,



cc: Elton King  
Scott Schaefer  
Joe Baker

**Norris, Sharon E - LGA**

**From:** rbbennett@att.com [SMTP:rbbennett@att.com]  
**Sent:** Tuesday, January 13, 1998 11:11 AM  
**To:** bsimmons@att.com; panelson@att.com; slmartin@att.com; snorris@lga.att.com  
**Subject:** FW: Response to Notes 1/6/98 Reject WorkSession

-----  
**From:** Gary.Romanick1@bridge.bellsouth.com [SMTP:Gary.Romanick1@bridge.bellsouth.com]  
**Sent:** Tuesday, January 13, 1998 10:49 AM  
**To:** Bennett, Rebecca, NLIAM  
**Subject:** Response to Notes 1/6/98 Reject WorkSession

Becky,

I have reviewed your document title "Notes 1/6/98 Reject Work Session".  
I made a couple of edits to the document, my changes were done in  
"BLUE" for easy recognition.

Gary



REJECT~4.doc

**Notes 1/6/97 Reject Work Session**  
**Attendees: Gary Romanick, Beverly Simmons, Becky Bennett**

Reviewed reject notes from 12/19 meeting, made corrections. Additional points on topic of understanding BST process;

When an order goes into error status in LEO, the order will show as either ~~AO\_ or PD\_ in SOCS. The 3<sup>rd</sup> character~~ represented by the blank is one of several characters indicating error status. Action: Gary to get list of what those code would be. Please refer to my letter dated January 7, 1998 for SOCS Error Codes. When order successfully passes through LEO, LESOG, and loads in SOCS,

- it first passes through the front end SOER edits order is in AO status (initial order). If it fails SOER front-end edits, it does not get distributed to downstream departments, and status changes to ~~AO\_ \_~~ AO.
- if it passes front SOER edits, status stays AO and is then is distributed to downstream departments (like engineering)
- if downstream department checks fail (example - the Line # group does a check to ensure this number is not already a working assigned number) the order status changes to ~~AO\_ \_~~ AO (initial order error). ~~Engineering is the very last department to get the order.~~ If engineering has facilities problem, status changes from AO or PD to PF (pending facilities).
- if order successfully passes downstream departments, order is considered ready to provision, and status changes to PD (pending order). If due date is missed, SOCS status changes to ~~PD\_ (3<sup>rd</sup> character means error status)~~. If the due date is missed for reasons caused by BellSouth, the order remains in PD status and is scheduled first on the next work list. If the due date is missed because the customer is not ready, the order status code changes to MA (missed appointment). When BellSouth issues reports showing completion due dates met, we cross reference the due date and compare it to the completion date, if they due not match it is considered a missed due date. Installation must show their work complete in order for SOCS to move order out of PD into CP status (CP= order completed but not yet available to bill). If order in PD\_

error status, must have error corrected in order to move to PD or CP status. Must be in CP edits before the billing edits are applied.

- If order is in CP status and fails billing edit(s), order status changes to [ Gary, what is answer?] \_\_CP.
- once order successfully passes billing edits, SOCS order status changes to CPX. SOCS then triggers LEO to send 855 or 865 completion notice.

**Notes from 12/19/97    AT&T/BST Meeting**  
**Topic: Reject and FOC cycle time**

**Attendees:** Gary Romanick, Beverly Simmons, Becky Bennett, Mel Porter

**Notes:**

We will have Issue7 electronic reject notification in March. Need to document on Appendix A picture both the today view (blue text below boxes) and the post-Mar/98 view (above boxes). Beverly - understands that 239 edits from SOER will be sending mechanized notification of rejects via LEO without LCSC intervention. Today LEO only rejects for format, in March will also reject for edits. Per Gary, SOCS will still handle the edits will just trigger mechanical notification via LEO. LSCS logs on, receive current unclaimed clarification worklist. Will be listed on worklist with oldest one first, system controls won't allow an associate to claim one lower on the list when there are older ones unclaimed. Service rep "claims" it, identifies error (order has error messages and highlighted fields showing what is wrong, also rep has online references with more detail on the error messages), makes notes in LEO (these are not transmitted to DOE), opens a clarification form (has some abbreviated reason choices on the form), populate form for submission to AT&T via fax server. Software for fax server is in LEO Mainframe (M/F).

- 1. Issue:** It is possible to close the record after claiming it, but without clarification notice being sent.
  - a. In the manual environment for clarifications, it is possible to close a record after claiming it, without sending a clarification to the CLEC. This is because clarifications must be printed and faxed after being placed in clarification status.

Gary's team to look at as possible cause for some of the long cycle times on rejects.) Order then sits in LEO in error status.

**2. Action: Gary to provide Becky, Mel, Beverly with LEO status to assess how the order changes status.**

- a. The error status in LEO is generated by a message from SOCS indicating error. Once it has been claimed and viewed by LCSC rep, error will either be cleared and Iss message sent to SOCS or clarification will be sent to CLEC and order will remain in error status. With the Rejects implementation in March, some additional status codes are being added to allow for the electronic clarification to be sent.

Five days after clarification has been sent to AT&T, LEO generates mech reminder that BST still waiting on response. 10-15 days from clarification sent date, cancellation notice is generated.

**3. Action: Gary to determine if LEO sends automatically or requires trigger from LCSC, what is trigger in either case (status change? Worklist?).**

- a. LEO automatically sends cancellation notice. There is a program automatically run in LEO each night comparing current date to date order placed in CLEC clarification status.

For AT&T today, when BST sends a cancellation notice, order is automatically changed to cancel status (K). If AT&T responds within 30 days of date BST sent out clarification, BST can manually intervene to fix or re-create the service order in SOCS.

**4. Action: Gary - find out what happens when order is in E status, and SOCS received a good 860 sup?**

- a. If the order is in "E" status which means its in clarification, and an 860 is received, which is the appropriate way to correct a clarification, the original 850 is replaced by the 860, generating and updated from LEO to SOCS.

**Does LEO issue FOC on SOCS notification?**

- a. LEO does issue FOCs on 860s whether they were sent to simply update an order at the end user's request or whether it is to clear a clarification.

**What happens to info on the LEO worklist?**

- a. It will automatically be removed because the 860 is received, however, if there is an error on the 860, then the PON could end up right back on the LEO work list.

Can you have a version 2 order processing OK thru SOCS, and a Version 1 continuing to hang in E status in LEO?

- a. You can not have a version 2 order working in SOCS and a version 1 order remaining in LEO because all orders have to come through LEO first, in which case the version 1 order would be "replaced" by the version 2 order when it comes in. The exception to this would be if the version 1 order came in through EDI to LEO, but the version 2 order was sent in via paper. In this instance, the LCSC rep could possibly type the version 2 order in DOE which would send it straight to SOCS without going through LEO. I believe when this is the case, the rep would have to manually move from work list.

AT&T always responds either with 860 sup or 860 cancellation. Under some conditions (usually a mapping or system constraint) AT&T cannot send an 860 that will fix the problem. In these rare cases (and after mutual agreement negotiated between Beverly and Gloria - BST (Gloria) will send a notice to LCSC telling the LCSC manual corrections for that specific condition - not on a one order basis, but M&P negotiated solution for limited conditions. For these specific conditions, BST has internal instructions to a) don't send AT&T clarification b) go into DOE and correct problem c) rep overrides AO\_ or PD\_ status in SOCS, which triggers SOCS to try and process the order.

5. Action: Gary to validate what system rep changes status to ISS in, and what effect not taking that action would have on the order progress. changes to ISS (for issues), which triggers SOCS.

When reps input corrections in DOE to SOCS order, they must re-gen or re-switch (ISS) order. SOCS will automatically notify LEO of correction. If no action is taken and order has proceeded to AO/PD status, then order would be provisioned as is.

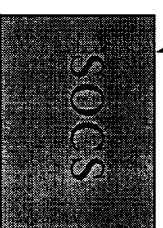
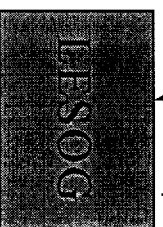
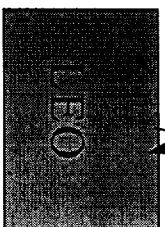
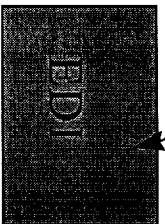
6. Action: Beverly to provide AT&T current list of such special conditions, Mel to get from Gloria.

**Next work session** 1/6/98 9 a.m. - 12 noon

**Location:** 1950 West Exchange (Gary to get room)

**Purpose:** To define action plan for performing root cause analysis and developing an improvement plan for reject cycle time. Readout of action plan scheduled for 1/7/98 8-9:30 am. with Pam, Debra, Jan.

## Today View of events



## Appendix A

Syntax check - if OK,  
send +997. If not, send  
-997 (does not go to  
clarification)

Validates for 5 fatal  
format errors  
If fails edits, does go  
to clarification, does not  
move to SOCS  
If ok thru edits, LESOG  
formats and loads to SOCS

SOER edits done here  
in 2 stages. If fails  
first set, is assigned  
E status in LEO, and,  
goes to clarification.  
SOCS status will be  
AO\_ or PD\_ where \_ is  
one of several error  
char. This SOCS status  
notifies LEO that there  
is error on the work-list  
If passes 1st set, SOCS  
notifies LEO that FOC  
needs to be created &  
sent. Post-FOC, can  
still fail 2nd stage blg  
edits, miss due date, or  
fail downstream depts  
checks and trigger error  
status. t.



3

B. Cavall  
R. Crafton  
D. Hassebrook  
✓ P. Nelson  
R. Douglas



William J. (Jim) Carroll  
Vice President

Room 4170  
1200 Peachtree St., NE  
Atlanta, GA 30309  
404 810-7262

February 19, 1998

Mr. Elton King  
BellSouth Telecommunications, Inc.,  
675 West Peachtree Street, N.E., Suite 4511  
Atlanta, Georgia 30375

Dear Elton:

The purpose of this letter is to obtain your assistance in correcting many recurring problems we are experiencing with BellSouth regarding our testing of AT&T Digital Link ("ADL") service. I have highlighted some of the issues below. It will take senior leadership direction within BellSouth in order to eliminate these problems.

Missed Firm Order Confirmation and Due Dates on Trunk Orders

BellSouth twice has missed Firm Order Confirmation dates and has missed the due date for trunk orders AT&T issued for testing our ADL service in Florida. Our testing was to have started on February 17 but we were not able to begin our testing without trunks from BellSouth.

BellSouth refused to expedite processing our trunk orders, even though we agreed to pay for expedited service. The latest information we have is that we may receive a Firm Order Confirmation by next week and we may be given a due date of March 6.

In addition to providing us with Firm Order Confirmations, we need BellSouth to send us the Access Service Requests associated with the trunk orders for work that we must perform after receiving Firm Order Confirmations. The bottom line is that our Florida testing has now been delayed at least thirty (30) days. BellSouth also has missed the Firm Order Confirmation dates for trunks we have ordered for similar tests in North Carolina and Tennessee. Our experience with this process so far concerns us as to whether our testing schedules also will be delayed in those states.

When you discuss our orders with others, please do not let them blame AT&T for these problems. We have seen BellSouth stop processing our trunk orders at the first occurrence of any "issue" with an order, rather than taking a comprehensive look at the order so that all changes or corrections that must be made are identified

Mr. Elton King  
February 19, 1998  
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up front. Time and again, we fix one issue, BellSouth starts working on the orders again, only to stop work because an additional issue is identified. This "knee-jerk" approach to processing our orders is causing unnecessary delays that could be avoided with a more comprehensive approach by BellSouth.

The result of this testing delay is that our introduction of ADL service in the Florida market will not occur as scheduled and we are concerned about similar delays that will affect our schedules in North Carolina and Tennessee. We are particularly frustrated because we had similar problems with our trunking orders when we tested the same service in Georgia. We also cannot understand why so many problems arise given that these orders are virtually identical to access orders that our two companies process all the time. It is obvious that there is little or no coordination or transfer of knowledge within BellSouth from one ADL test situation to the next.

#### Incorrect "Tie Down" Information on Trunk Orders

There is another recurring problem relating to trunking. BellSouth did not correctly apply the "tie down" information to our trunk orders when we tested in Georgia, even though we had obtained BellSouth's agreement on how "tie down" information would be provided to AT&T. We thought that after our experience in Georgia and the significant time our collective employees spent in fixing that problem, BellSouth would be able to execute correctly on the "tie down" information as we moved to new states for testing. That expectation did not prove to be correct. We have the same "tie down" problems with our trunk orders for Florida.

#### Special Assembly Charges When Porting a DID Numbers

Also in connection with our testing of ADL service in Georgia, we received notification from BellSouth that we (and ultimately our customers) will be billed special assembly charges because your tariffs are set up such that if we port less than a block of 20 DID numbers, we must pay special assembly charges. After spending too much time arguing over this, we sent a letter to BellSouth agreeing to pay these special assembly charges under protest —so as not to delay our testing. Now we learn that BellSouth also intends to bill our customers a per number charge, not only for the numbers not ported away from BellSouth, but for those numbers that are ported away and no longer belong to BellSouth! In addition to these two issues, we just received another letter dated February 10 from Iris Ely of BellSouth's Interconnection Services. Ms. Ely's letter asks us to sign yet another form for a "New Business Request" so that we can port DID numbers. Her letter made it clear that even though we already sent BellSouth our letter stating that we will pay BellSouth's special assembly charges for our Georgia test under protest, our orders still would not be provisioned until we signed your "New Business Request" form. Adding further delay, Ms. Ely's letter was addressed to Pamela Nelson with an incorrect address which meant it took six days for the letter to be delivered.

Mr. Elton King  
February 19, 1998  
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8YY Billing

We are growing increasingly frustrated with BellSouth's refusal to agree to an interim solution for 8YY billing, an issue also affecting ADL service. We received a letter dated February 5 from Jan Burriss at BellSouth that listed various reasons why BellSouth cannot agree with AT&T's proposal for how this billing could be done. Frankly, we find it hard to accept some of the reasons stated in the letter. This issue affects the industry, not just AT&T. We do not need excuses; rather, we need your team at the table so that we can jointly develop an interim solution for how 8YY billing will be done.

Incorrect Zip Codes in Database Used by BellSouth

In addition to these issues, we need resolution to a problem that requires AT&T to manually place incorrect information on "clean" orders in our system. We are required to do this because BellSouth edits our orders against an outdated 911 database of billing addresses that contains incorrect zip codes. BellSouth will reject our orders if we do not make these manual edits because our correct zip codes will not match your system's incorrect zip codes.

The way to avoid repeating the same problems in every state as testing on ADL service progresses is for BellSouth to appoint a Project Manager to work with us on our ADL tests. The magnitude of the problems we have seen in our Georgia and Florida tests make the need for a Project Manager an inescapable conclusion.

Please call me so that we can talk about these issues and how we can best jointly work to eliminate these problems.

Sincerely,



William J. Carroll

cc: Mr. Scott Schaefer  
Mr. Quinton E. Sanders

RECEIVED NOV 1 1997

295



Beverly A. Simmons  
Negotiations & Implementation Manager

Room 12NC8  
Promenade II  
1200 Peachtree St. NE  
Atlanta, GA 30309  
404 810-4932

November 11, 1997

Mr. Melvin Porter  
5147 Peachtree Industrial Blvd.  
Atlanta, GA 30341

Dear Mel:

This letter concerns rejects/clarifications, sent to AT&T's CNSC by BellSouth's LCSC, advising that BellSouth, is canceling these particular orders because they are over 10 days old with no activity. The process BellSouth agreed to follow that is described in a letter to Pamela Nelson dated October 15, 1997, provides that AT&T may issue a supplement 860 to modify or cancel an order within 30 days of its issuance. Canceling AT&T's orders after 10 days is not consistent with the process described in the letter.

Listed below are 6 examples of rejects/clarifications sent by BellSouth to the CNSC:  
PON: 0073014064-0001      TN: 912-232-1468

0006667171-0001	770-474-4337
0061118134-0001	770-502-9109
0023887913-0001	770-489-5785
0024492412-0001	912-477-5785
0068068134-0001	770-475-3675

Please investigate and provide a written response describing the steps, BellSouth will take to assure that the process outlined in your letter is followed and that our orders will not continue to be canceled after 10 days.

Sincerely,

A handwritten signature in cursive script that reads "Beverly Simmons".  
Beverly Simmons

cc: Margaret Garvin  
Natasha Ervin

Bellsouth Interconnection Services  
Suite 200  
1860 West Exchange Place  
Tucker, Georgia 30084

770 482-7550  
Fax 770 492-9412

AT&T Regional Account Team

November 7, 1997

Beverly Simmons  
AT&T  
Promenade II  
Room 12N08  
1200 Peachtree St, NE  
Atlanta, GA 30309

Dear Beverly,

The matter of reducing errors and improving the clarification process is receiving the attention that AT&T desires from within our organization. As I mentioned during this week's conference call, I recently completed an analysis of 600 clarification forms at the request of Quinton Sanders. I then compiled a report which shows the most common reasons for order rejection, and how many orders were rejected for each reason. I am attaching a copy of the report for you.

In addition to this report, I have shared the revised clarification form with both Quinton and Jan and they support the adoption of the draft. They are now assisting with the approval process. I have also shown them examples of both "good" and "bad" clarification responses from the LCSC, and they recognize AT&T's concerns in this area.

Finally, as we consider several options for reducing the overall error rate, we would like to review the type and level of training that AT&T personnel may have already received on issuing orders, identifying errors, and clearing them. Specifically, we would like a list of the names and titles of all persons who have undergone some form of service order training. It would also be helpful to know what the training sessions actually covered. If providing a comprehensive list is not possible, we can work with a list that represents a sampling of persons trained, their titles, and what was covered. This information will greatly assist us in developing a strategy for process improvement.

Thanks in advance for your help.

Sincerely,

*Tosha Ervin*

Tosha Ervin

NOV-07-1997 13:43

P.02

## **CLARIFICATION REPORT**

**\*600 clarifications reviewed for this report**

**\*Review period is September and October 1997**

**\*Per Ron Moore, clarification interval ranges from 40 to 27 hours with a 13 hour improvement achieved in second review period**

**\*Reasons for clarification broken down into 8 categories:**

### **1. LISTING ERRORS:**

**P.O. Box shown as listed address**

**Requests for same TN to be both published and nonpublished**

**Spacing errors**

**Punctuation errors**

**Listing information completely omitted**

**210 CLARIFICATIONS - 35%**

### **2. USOC ERRORS:**

**Incompatible USOCS**

**Invalid USOCS, most commonly NOB for anonymous call rejection and NXM for caller ID**

**USOC incompatible with residential class of service**

**120 CLARIFICATIONS - 20%**

### **3. CANCELLATIONS:**

**PON over 30 days old**

**Version 1 of PON canceled then subsequent versions issued**

**Duplicate PONs**

**Order worked on Version 1, subsequent versions issued unnecessarily**

**70 CLARIFICATIONS - 11.7%**

### **4. OTHER:**

**Service already working for ATT**

**Illogical due dates, requested due date was before BST's receipt of the LSR**

**LSR unclear, BST can not determine what changes are requested**

**Lifeline questions**

**58 CLARIFICATIONS - 9.7%**

**5. RSAG/INVALID ADDRESS ERRORS:**

**62 CLARIFICATIONS - 10.3%**

**6. INCORRECT TELEPHONE NUMBER:**

TN not in service  
TN in service for another customer  
Exchange not valid for service address

**39 CLARIFICATIONS - 6.5%**

**7. MISSING OR INCORRECT INFORMATION IN S&E:**

**23 CLARIFICATIONS - 3.8 %**

**8. INCORRECT ACTIVITY CODE:**

**18 CLARIFICATIONS - 3 %**

RECEIVED OCT 21 1997

248



A. J. Calabrese  
LIAM Vice President  
Southern States

Room 10144  
1200 Peachtree St.  
Atlanta, GA 30309  
404 810-4575  
FAX: 404 810-4593

October 20, 1997

Mr. Mark Feidler, President  
BellSouth Interconnection Services  
4511 BellSouth Center  
675 West Peachtree Street  
Atlanta, Georgia 30375

Dear Mark:

As you and I have discussed many times over the past months, it is absolutely critical to AT&T, as it is with new local market entrants, to have operational parity with BellSouth. The Interconnect Agreement our two companies signed requires it, the Telecommunications Act demands it, and the Eighth Circuit Court ruling does nothing to alter these obligations. After months of negotiations and discussions at all levels, the fact that we continue to struggle on a daily basis to achieve practical, operational parity causes me great concern. This is what prompts me to write this letter today. Specifically, I would like to again ask for your help in removing barriers to the resolution of two related operational parity deliverables: 1) AT&T receipt of all BellSouth system business rules for the rejection of orders. 2) The electronic reject capability required by the Interconnection Agreement that is already months late.

First, I ask you to break the logjam on BellSouth's providing all the editing rules for BellSouth's ordering systems - LESOG, LEO, and SOCS/SOER. Your team provided the LESOG edit rules on September 25, 1997, and owes us a confirmation that we have the complete LEO system rules. However, you have neither provided the SOCS/SOER system edits nor given a date by which such edits will be provided. It has to be apparent that knowing the "rules" that the BellSouth ordering systems use to reject orders would benefit both AT&T and BellSouth by minimizing end-user customer dissatisfaction over problems with getting service. For any AT&T order to successfully pass through BellSouth's systems, it must "survive" all of the system edits that BellSouth's systems employ. AT&T needs to know, and be able to handle, all the potential



- 2 -

reasons/rules that might cause AT&T customer orders to be rejected. With this information, edits on our side of the interface can be developed to complement your edits. Sharing such information will also provide tangible operational benefits for both AT&T and BellSouth. As the edits are understood and operationalized, AT&T and BellSouth would not have to be engaged in so much follow-up on rejected orders. The result should be fewer "reworks" of orders and improved customer service.

Second, I request that you personally see to it that the electronic reject capability required by our Interconnection Agreement be implemented. I know you are equally aware of the contract provisions which obligate BellSouth to provide this capability. While I acknowledge your AT&T account team's attempts to move this issue through your Contract Compliance organization, I must insist that you use your position as AT&T's executive advocate at BellSouth to ensure an immediate resolution of this issue which BellSouth has repeatedly delayed since the March 31, 1997, date specified in the Interconnect Agreement. Despite BellSouth's comments to the contrary, an electronic reject capability will be a great improvement over that provided by the manual facsimile mode both in terms of accuracy and completeness, as well as efficiency (e.g. incomplete and insufficient reject detail is often provided on the manual reject, whereas the ability to receive reject details electronically reduces turn around time and minimizes re-entry errors).

Mark, I think you can appreciate the untenable position imposed on AT&T by BellSouth's delaying the provision of the requested edit rules and the electronic reject capability. Under the circumstances, there is no way for AT&T to even hope to match the level of service that BellSouth can provide because we don't even have access to the same information that BellSouth has - information necessary for orders to just pass through BellSouth's systems. Our customers are rightfully frustrated, and for that matter, so are our employees.

BellSouth's refusal to provide this information and to implement the electronic reject capability has contributed to the high number of rejected orders AT&T has experienced. Because of the customer dissatisfaction created by rejected orders, we have had to curtail our marketing program to a minimal number of orders to effect "damage control" in the marketplace we are trying to enter. This situation is adversely affecting AT&T's entry into local services in the Southeast and is intolerable. To enable AT&T's ordering process to be effective and begin to approach parity with BellSouth's ordering process we have the following interrelated requirements: 1) a detailed explanation of the business rules and edits as outlined above, 2) a mapping of these edits to reject codes that BellSouth is providing, and 3) an electronic capability to deliver and receive the

reject codes. BellSouth needs to fulfill its obligations. Therefore, your immediate attention is requested.

I await your reply and your plan to address and close these two very important parity concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Al Calabrese', followed by a long horizontal line extending to the right.

Al Calabrese

cc: Quinton Sanders  
Pam Nelson

PS: Given my several discussions with Quinton Sanders about the fact that our volumes have always been within our forecast, and well below BellSouth's stated capabilities to process orders, I have not responded in writing to Quinton Sanders' letter of August 15 expressing BellSouth's surprise at the volume of AT&T orders in the early August time frame. I would be glad to send you a more formal response to Quinton's letter if you would like more details on the actual volume of orders entered compared to the forecasted amounts.

---

# Facsimile Cover Sheet

This message contains 4 pages, including this cover sheet. If any part of the message is not clear or complete, please contact the sender below.

**To: Pam Nelson**

**Tele: 810-3100**

**FAX: 810-3131**

**From: Al Calabrese**

**Tele: 404-810-4575**

**FAX: 404-810-4593**

**\*\* Comments \*\***

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**BellSouth Interconnection Services**  
Suite 300  
1900 West Exchange Place  
Tucker, Georgia 30084

Contact 770 492-7537  
Fax 770 492-9412  
Pager 1 800 946-4646 Pm 1418556  
Internet Address:  
Margaret.Garvin@bridge.bellsouth.com

Margaret Y. Garvin  
Sales Director  
AT&T Negotial Account Team

October 28, 1997

Linda Mull  
AT&T  
Promenade II  
1200 Peachtree St.  
Atlanta, Ga. 30309

Dear Linda:

This is in response to your letter dated October 24, 1997 and our conversation with Sally Strain on Monday, October 27, about directory listings ordering. It is our intent to provide you with Phase I business rules, gaps in the Phase 1 and Phase 2 documents and have a meeting to discuss your questions and concerns after you have reviewed the information.

However, your request to provide all Phase I business rules and associated EDI examples by October 28, 1997 is unrealistic. As previously stated, our SMEs are working all the hours possible to provide you with this information. We will give you the first package of information on November 3, 1997, the next package on November 17 and the balance of information on November 28. A tentative date to meet with the SMEs is Monday, December 1, 1997.

It is BellSouth's goal to help AT&T migrate to a point where fewer errors are occurring on your directory listings orders. If you have questions, you may contact me at 770-492-7537.

Sincerely,

Margaret Garvin  
Sales Director

BellSouth Interconnection Services

Facsimile

From  
Department  
Address

**MARGARET GARVIN**  
AT&T Regional Account Team  
1860 West Exchange Place  
Suite 200  
Tucker, GA 30084

Telephone number  
Fax number

770-492-7550  
770-492-9412

To

**LINDA MULL**

Telephone number

Fax number

**706-838-4678**

Comments

If this fax is not received in good order, please contact the sender listed above.

Date

**10/29**

Total number of pages

**2**

10/29/97

TO: Pam Nelson  
Milford Stanley

FROM: Linda Mull

Attached is Margaret Garvin's response to my DL letter. The timeline suggested by BST is not acceptable AND they do not identify what information will be provided on each of the dates.

Page 1 of 3

RECEIVED OCT 28 1997



October 24, 1997

Promenade II  
1200 Peachtree St.  
Atlanta, GA 30309

Margaret Garvin  
BellSouth  
1960 West Exchange Place  
2<sup>nd</sup> Floor  
Tucker, Georgia 30084

Dear Margaret:

In June of this year, AT&T and BellSouth met to discuss issues concerning the business rules for our Phase I implementation of Directory Listings ordering. In subsequent meetings and conference calls, AT&T and BellSouth have discussed various directory listings issues, including our Phase I implementation issues; the majority of which remain unresolved.

We discussed with you in our meeting on October 9, 1997, that AT&T believes BellSouth has inserted many of its Phase 2 expectations into the development of the Phase I Directory Listings interface between AT&T and BellSouth. Many of these Phase 2 (now BellSouth Phase 1) expectations have not been negotiated or agreed upon between our companies. As a result, even more rejects are occurring. Therefore, BellSouth must develop internal processes to accommodate, without rejection, AT&T Directory Listing orders where BellSouth has implemented Phase 2 business rules that AT&T does not plan to implement for Phase 1.

AT&T cannot accurately and efficiently order Directory Listings for its customers without receiving from BellSouth ALL outstanding business rules for the AT&T Phase I Directory Listings interface. We also require associated examples of how the EDI fields must be populated. During our telephone conversation on October 20, 1997, you stated that BellSouth will provide this information to AT&T in piece parts on the following dates: 11/3, 11/17, 12/1, and 12/15. This timeline is unacceptable.

We need to schedule a meeting as soon as possible between AT&T and BellSouth subject matter experts so that they can further discuss the issues addressed in this letter. Attached is a list of the items immediately requiring further information from, and discussion with, BellSouth. As is evidenced by the nature of the information attached, it is clear AT&T and BellSouth must quickly resolve these long outstanding Directory Listings issues as they are basic to the ordering of Directory Listings.

By October 28, 1997, please provide the following: (1) all not yet provided Phase I business rules and associated EDI examples as outlined in the attachment, (2) BellSouth's proposal for accommodating those AT&T Directory Listings orders where BellSouth has implemented Phase 2 expectations that AT&T does not plan to implement for Phase 1, and (3) BellSouth proposed dates for a two day SME meeting to discuss the items listed above.

Please call me on 706-838-4676 if you have any questions.

Sincerely,

*Linda L. Mull*

Linda L. Mull

cc: Tasha Ervin  
Milford Stanley  
Patricia Nelson  
Beverly Simmons  
Michael Cruz

## CRITICAL ITEMS REQUIRED FROM BELLSOUTH FOR STABILIZATION OF PHASE I DIRECTORY LISTINGS ORDERING

### PHASE I BUSINESS RULES / EDI EXAMPLES

- 1 ALL business rules for the Listed Name field which include formatting rules and identification of all elements to be included in listed name (e.g., double virgule, double parentheses, prefix titles, suffix titles, punctuation, capitalization, +, \*, semi-colon, comma, FIDS, sequencing, etc.) for Phase I.
- 2 ALL other (non-Listed Name field related) business rules for electronic ordering which were not agreed to for Phase I, but are expected by BST. These areas require understanding, negotiation and agreement as to handling.
- 3 Rules of precedence for Phase I agreed upon listed name codes.
- 4 Clarification as to what the listed name codes FSPL, SPL, JU and CML mean, rules of precedence, and examples of how this data is to be sent to BST.
- 5 List detailing all acceptable listed name code combinations.
- 6 Business rules for formatting AC and FAC options (If Busy Call, If No Answer, After Hours Call, If Extension Is Not Known, and Nights, Weekends) regarding capitalization, spacing, etc.
- 7 AT&T requires BST provide answer to when using optional listing type, and AT&T populates address in the listed address field, does BST need a virgule and what does the listed address field do at BST? In other words, does the LA field negate the need for /LA on optional/additional listings?
- 8 AT&T requires that BST determine if an order will reject that has either OAD or an address where an address is not available to the end user and if BST will reject an order that does not have an address where end user is entitled to an address.
- 9 BST to determine if space required before (PRE), after (PRE) or both.
- 10 Examples (both electronic and paper) detailing how AT&T is to send foreign directory sub-directory information.
- 11 Example of Children's listing number as ring master #. AT&T also requires example of children's listing as a plain vanilla listing. This is to address the use of PN vs. TN.
- 12 Business Rules and Examples of how to order listing where service observing equipment applies.



### **PHASE I PROCESS AGREEMENT REQUIRED**

- 13 If orders with activity type of C are being processed today, AT&T requests that BST update the Phase I IG to reflect this. If orders with activity type of C are being rejected, AT&T and BST need to agree on process to handle these consumer orders.
- 14 AT&T requires that BST accept/not reject orders where Phase II instruction codes + and \* are not used. BST must accept capitalization as shown on orders (without \* to indicate capitalization). BST must accept suffix as shown on orders (without + to indicate suffix).
- 15 AT&T requires a workaround process until the listing instruction code (DST) can be implemented for cross reference and foreign cross reference listings. AT&T requires BST's agreement to use (1) as the interim (DST) indicator and not reject orders until DST is implemented. AT&T requires BST verify if an order will reject if the word following the instruction code (DST) is not "See".
- 16 Where list code is AC (Alternate Call), AT&T and BST agreed to send FNA as the USOC for business and NAB as the USOC for residence for phase I. Now BST requires that AT&T send a different USOC for AC's depending upon what text is selected for the AC. AT&T requires that BST not reject its orders for AC based upon non-use of Phase II USOCs for AC and that BST process AT&T's orders for AC with the USOCs agreed to for phase I (FNA and NAB).
- 17 AT&T requires that BST develop process for accepting wording for AC for other phrases than listed above (e.g., From 8:00 to 5:00) rather than require these phrases be sent as SPL. SPL not agreed to for phase I.
- 18 AT&T requires that BST provide the wording/phrases, formatting requirements, and the associated narrative description for all allowable special text directory listings.
- 19 BST to determine if AT&T can repeat the listed name field as many times as needed to allow information required for various listing types. AT&T's preference is to use a 99 continuation segment.
- 20 BST must develop a process to accept /DGN on AT&T residence orders (e.g., /DGN CPA) in lieu of + for professional degrees, suffixes and titles as /DGN was not agreed upon for phase I.
- 21 AT&T requires a 2 day meeting with BST to discuss and come to agreement on how to handle those items not agreed to for phase I. BST must have EDI and business rules representation at the meeting so that BST can immediately address AT&T's questions.

10/24/97

TO: MARGARET GARVIN  
TASHA ERVIN  
KATHY MASSEY

FROM: LINDA MULL  
706-838-4676 (voice)  
706-838-4678 (fax)

PAGE 1 of 4

10/27/97

TO: PAM NELSON  
MILFORD STANLEY  
BEVERLY SIMMONS  
MICHAEL CRUZ  
KATHY TABER

*please  
copy  
for all  
thanks!*

FROM: LINDA MULL

PAGE 1 OF 5

Beverly Simmons

AT&T  
Promenade II  
Room 12N08  
1200 Peachtree St., NE  
Atlanta, GA 30309  
404 810-4932  
FAX: 404 810-3131

October 14, 1997

Melvin Porter  
BellSouth Interconnection Services  
5147 Peachtree Industrial Blvd.  
Atlanta, GA 30341

Dear Mel:

This letter is concerning orders that BellSouth acknowledges are being processed by sending AT&T a FOC (Firm Order Confirmation). After AT&T receives the FOC BellSouth then sends a clarification/reject notice indicating that the orders are not being processed.

In previous negotiation discussions and through documentation provided by BellSouth, the FOC process is initiated when an order has successfully passed all system edits. Also, based on LESOG (Local Exchange Service Order Generator) edit rules, if an order cannot be formatted into a BellSouth service order it will fallout to the LCSC (Local Carrier Service Center) for manual handling. The status of orders that LESOG cannot format is "E" for error, until the error status is manually changed by the BellSouth representative, the FOC transaction cannot be system generated.

Listed are the orders rejected after receiving a Firm Order Confirmation:

Order Number:	Due Date:
N0082373958-0001	9/23/97
N0008446621-0001	9/03/97
N0014169705-0001	8/27/97
n0089313742-0001	9/08/97
N0076716861-0001	9/18/97
N0044722998-0001	9/15/97
N0047245852-0001	9/16/97
N0088605903-0001	9/16/97
N0069129890-0001	9/16/97
N0093203310-0001	9/16/97
N0003872230-0001	9/26/97
N0010387314-0001	9/26/97
N0077107639-0001	9/10/97

AT&T requests an explanation of how these orders passed LESOG edit rules, generated a FOC then moved to the LCSC for manual handling. We need confirmation of whether BellSouth's mechanized order processing changed. We also request confirmation of whether there are any order processing edit rules that have not been provided to us.

Please provide a response by October 20, 1997.

Sincerely,



Beverly Simmons

cc: Margaret Garvin

OCT 1 1997



Jill R. Williamson  
Local Services Program Manager

Room 12255  
Promenade I  
1200 Peachtree St. NE  
Atlanta, GA 30309  
404 810-8562

September 26, 1997

Ms. Jo Sundeman  
BellSouth Interconnection Services  
Suite 410  
1960 West Exchange Place  
Tucker, Georgia 30084

Jo,

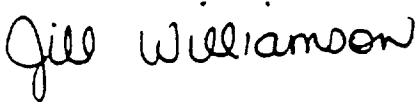
As you are aware, AT&T has submitted orders for 12 UNE-P test participants in Florida. As a result, several issues have surfaced that affect the processing of these orders. Specifically, the firm order confirmation (FOC) standard intervals have not been adhered to and apparently, BellSouth's ordering process for UNE-P (loop/port combos) has changed without proper notification to AT&T.

To summarize the intervals for FOCs, of the 12 orders submitted to the LCSC, only two FOCs were faxed back to me within the standard 24 hour interval. Six of the twelve orders required AT&T to re-issue supplemental orders, and of those six, five of the FOCs were received within 24 hours. On the remaining four orders, the FOCs were received approximately 48 hours after the order was sent to the LCSC. The AT&T/BellSouth Interconnection Agreement, Attachment 12, specifies that the agreed to interval for receiving a FOC is 24 hours. If BellSouth is now changing its' position, please advise me in writing. If BellSouth's position continues to be that a FOC will be returned within 24 hours of receiving an order, I would like your assistance in resolving whatever issues are preventing BellSouth from returning FOCs to AT&T within that time.

The change in the ordering process was discovered when one of the clarification forms I received stated that BellSouth needed to know the activity type. When I called the customer services representative back to clarify the note, he informed me that BellSouth does not accept a "W", swap as is, on UNE-P orders (loop/port combos). I then spoke with Alberta Austin regarding this issue and she indicated that BellSouth has a document detailing acceptable activity types for port/loop combos and that an activity type of "W" and "A" Add/New were not acceptable as described in that document. We have not been provided a copy of that document. I do not understand why these values are now not acceptable, but an even larger concern is that I received no notification that BellSouth had changed its' ordering process for loop/port combos. Please provide a copy of your "new" guidelines to me immediately.

I would also like an explanation of the rationale for these changes that BellSouth has made because such unilateral changes create unnecessary re-work to modify existing orders. I also would like to understand BellSouth's process for advising AT&T of proposed process changes. Obviously, AT&T wants to avoid similar occurrences in the future. This is critical for us to develop our processes for delivering local service with reliability, timeliness and quality.

I would appreciate your immediate response in writing to my concerns listed above no later than Wednesday, October 1, 1997.

 Jill Williamson

cc: Jan Burris  
Marcia Moss  
Valerie Gray  
Pam Nelson  
James Hill

RECEIVED DEC 4 1997



312

Jill R. Williamson  
Local Services Program Manager

Room 12255  
Promenade I  
1200 Peachtree St. NE  
Atlanta, GA 30309  
404 810-8562

December 1, 1997

Ms. Alberta Austin  
BellSouth Local Carrier Services Center

Alberta,

Subsequent testing of services ordered for AT&T's Unbundled Network Elements Platform test participants in Florida have revealed some discrepancies in what we believe has been ordered and what has been provisioned on the test participants lines. Attached is a chart indicating the errors found thus far.

Please advise me per the customer's service record (CSR), whether or not the order was input correctly or if the service may have been provisioned incorrectly. I would appreciate your written response by Wednesday, December 3, 1997.

*Jill Williamson*

cc: Jan Buriss  
Foster Haley  
Pam Nelson  
James Hill



AT2001MIAMI	Migrate as Specified: 305-672-0200, AT&T PIC, Caller ID Basic, Block 900/976, Unbranded OS/DA	Operator and Directory Assistance branded as BellSouth; Time and Charges on Person to Person call incorrect
AT0101MIAMI	Migrate as Specified: <b>561-488-2973</b> , AT&T PIC, Call Forwarding Variable, Unbranded OS/DA <b>561-488-5780</b> , Sprint PIC, Call Forwarding Variable, Unbranded OS/DA	Operator and Directory Assistance branded BellSouth on both lines; Person to Person time and charges incorrect on 561-488-2973; on 9/26/97 PIC on 561- 488-5780 was checked and was not Sprint

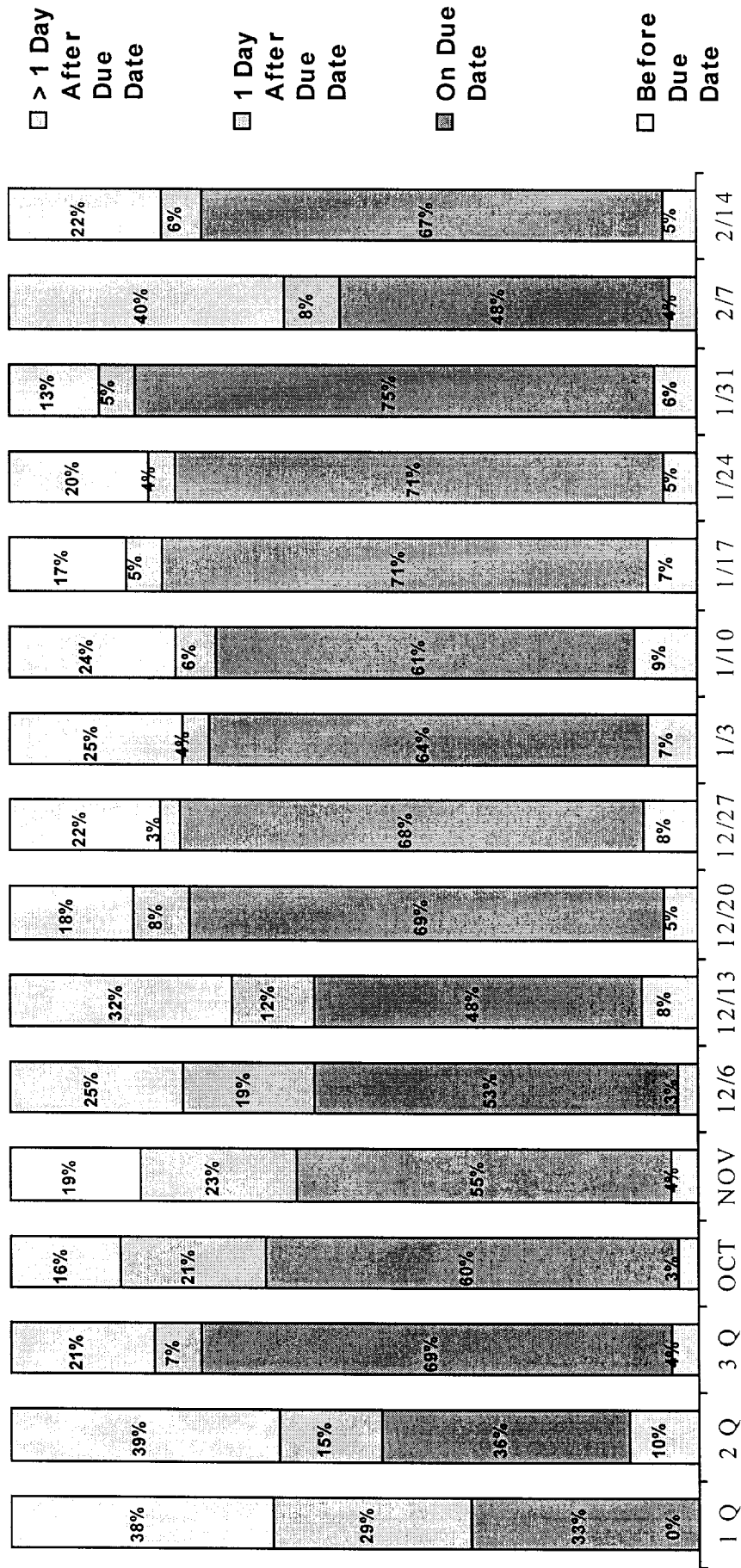
Attachment 2  
TRA Docket 97-00309  
AT&T Response to  
Consumer Advocate Division's  
Second Discovery Request

Request: Provide copies of all analysis in AT&T's  
possession concerning the number of or per cent of times  
BellSouth fails to meet the intital established due date.



# BellSouth Georgia Performance

## Completion Intervals

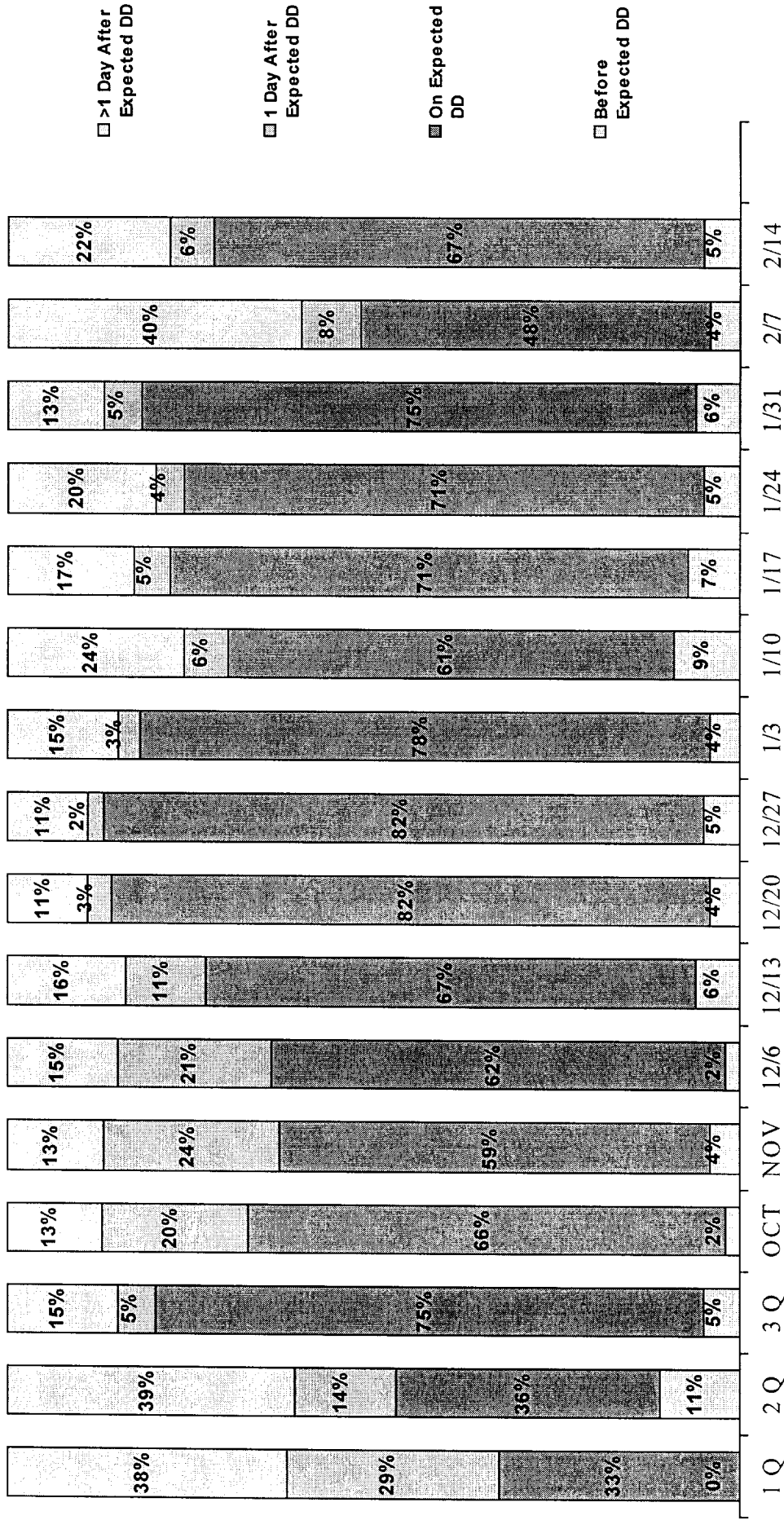


NUMBER OF TOTAL ORDERS COMPLETED EACH QTR / MONTH / WEEK:

Count Includes New,  
Migration and Other Orders



# *BellSouth Georgia Performance Supplier Completion Intervals*



NUMBER OF TOTAL ORDERS COMPLETED EACH QTR / MONTH / WEEK:

21	866	7877	3704	3742	765	431	466	325	315	507	522	520	525	550	532
----	-----	------	------	------	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----

Count Includes New,  
Migration and Other Orders

Attachment 3  
TRA Docket 97-00309  
AT&T Response to  
Consumer Advocate Division's  
Second Discovery Request

Beverly Simmons

AT&T  
Promenade II  
Room 12N08  
1200 Peachtree St., NE  
Atlanta, GA 30309  
404 810-4932  
FAX: 404 810-3131

October 17, 1997

Melvin Porter  
BellSouth Interconnection Services  
5147 Peachtree Industrial Blvd.  
Atlanta, GA 30341

Dear Mel:

This letter concerns the ordering process for service Migrations performed through LESOG (Local Exchange Service Order Generator). AT&T is receiving customer complaints, stating that they've experienced service interruptions between the hours of 12:01 AM and 6:00 PM on the date that a conversion from BellSouth to AT&T was to occur.

BellSouth's Service Migration process described during negotiations and in documentation provided to us is as follows: When a LSR (Local Service Request) to migrate a customer from BellSouth to AT&T is sent from LEO (Local Exchange Ordering) system to the LESOG (Local Exchange Service Order Generator), two service orders are generated. LESOG then is supposed to automatically generate a disconnect order and a new connect order, and relate both orders to one another for processing.

However, we understand that instead, when the LESOG generates the new connect order an error occurs, by putting an incorrect, related order information (FID) Field Identifier on the new connect order. This FID is placed on the order by BellSouth. The FID that should appear on the BellSouth generated order is "AVNL" indicating coordinate relate orders, the actual FID that's appearing on the BellSouth order is "AVNA", causing the new connect order to fallout to the LCSC (Local Carrier Service Center) for manual handling. Once the order sequence is broken there's no coordination to prevent a service interruption. On October 15, 1997, Gloria Burr of BellSouth, informed us that the LCSC representatives are typing the following remarks entries on these new connect orders: "Re-establish customer service for CLEC coordinate orders". This remarks entry isn't preventing the disconnect order from processing before the new connect order is processed, resulting in customer outages.

Mel, on September 10, 1997, I discussed this particular issue with you. In that conversation, you assured me that service Migrations are transparent to the end user. Obviously that isn't the case. After talking with Gloria Burr about this issue, she discussed it with Cherry Smith of BellSouth, who confirmed that service interruptions are occurring. Cherry issued a defect ticket on October 15, 1997 to correct this problem. AT&T is deeply concerned that our first inquiry wasn't thoroughly verified. This issue could have been resolved much earlier, avoiding the significant number of customer complaints that AT&T has received in the meantime.

With this letter, I am requesting that BellSouth implement a quality control process to provide AT&T with assurances that all AT&T inquiries have been thoroughly researched and verified.

Please provide a response to me by October 20, 1997 setting forth the date that the defect ticket will be implemented, and identifying the preventive measures BellSouth will put in place to ensure

that these customer service outages will not recur.

Sincerely,

A handwritten signature in cursive script, appearing to read "Beverly Simmons".

Beverly Simmons

cc: Margaret Garvin

Attachment 4  
TRA Docket 97-00309  
AT&T Response to  
Consumer Advocate Division's  
Second Discovery Request





Pamela A. Nelson

Room 12N54  
Promenade II  
1200 Peachtree St. NE  
Atlanta, GA 30309  
404 810-3100

January 6, 1998

Ms. Jan Buriss  
BellSouth  
Suite 410  
1960 W. Exchange Place  
Tucker, Georgia 30084

Dear Jan,

It has been brought to my attention that changes have been made to BellSouth's April, 1997 Local Interconnection and Facility Based Ordering Guide. Based on the Georgia Interconnection Agreement, General Terms and Conditions, Section 17, page 18, all notifications are to be delivered to me either in hard copy written form or, as we discussed at the last core team meeting, by e-mail (including a written description of the changes) with hypertext links to the updated materials. To date, I have not received any updates to BellSouth's Local Interconnection and Facility Based Ordering Guide.

AT&T was made aware of these changes while attempting to place orders for its Unbundled Network Elements Platform test. The BellSouth Local Customer Service Center (LCSC) forwarded to AT&T what appears to be a BellSouth internal notification of these changes dated August 7, 1997.

AT&T has written several letters to BellSouth requesting copies of updates to the Guide only to be referred to BellSouth's website. Please refer to letters from Jill Williamson dated September 26 (to Jo Sundeman), October 3 (to Jo Sundeman), and November 3 (to Foster Haley), 1997.

Please provide to me all updates to BellSouth's Local Interconnection and Facility Based Ordering Guide by Friday, January 16, 1998. Also, please explain in writing by the same date why the process of distributing updated procedures is not working, and provide a plan for resolving this issue.

Sincerely,



Copy to: Margaret Garvin  
Debra Stockton  
Jill Williamson  
James Hill

From: Valencia, Wilma, NLIAM  
Sent: Thursday, December 11, 1997 3:11 PM  
To: Bailey, Alicia C, SLSO  
Cc: Berry, Frank L, SLSO  
Subject: FW: Clarification request dated 11/10/97

Alicia,

This is BellSouth's response regarding the Call waiting deluxe feature that's on your open issues list for North Carolina. Please let me know if this is sufficient information for you.

Thanks,  
Wilma

---

From:  
Gregory.Kirby1@bridge.bellsouth.com[SMTP:Gregory.Kirby1@bridge.bellsouth.com  
]  
Sent: Thursday, December 11, 1997 1:59 PM  
To: Valencia, Wilma, NLIAM  
Subject: FW: Clarification request dated 11/10/97

Wilma

I am sending a request for correction to add the call waiting deluxe feature for North Carolina in the LEO Guide. I have checked the tariff again and the feature is available in North Carolina. While the LEO Guide is incorrect, adding the feature to a line in North Carolina should not cause an error on a service order provided the central office is equipped to handle the feature.

Should you need anything else, please call me at 770-492-7574.

Thanks

Greg

Margaret,

Between you or Debra, we are not quite sure who's organization would address the following? Would you please address the following questions on Blocking of Per Use Features:

**BLOCKING OF PER USE FEATURES**

BellSouth referenced on page 17 & 18 under Custom Calling Features in the LEO Guide (Volume 2, Part 1, July 1997 to be specific).

The USOCs are CIDS, CNAB, CND, CNDB and DARCW. We need the definition of these USOCs. We can not find a definition in LEO or in the tariff.

AT&T has additional question that we need to add regarding this topic:

Our understanding is that we only need the capability to "block" per use features, and that we do not need to "block" per line features. If a customer does not want a per line feature, they simply would not order it. There are USOCs on page 17&18 in LEO that reference features (ACR, CFBL, CFDA, CFV, DARCW, SCF, SCR) that are per line, not per use features.

Why does BellSouth offer USOCs for blocking these features, when in reality if the customer does not want the feature they simply would not order it? We are somewhat confused that they appear on this list and want to understand if it is an error in LEO or if we are incorrect in our understanding of blocking.

Please clarify and respond by COB on 11/12/97.

Thank you,

Michael Cruz  
404-810-8256  
AT&T Vendor Mgt



Southern Region

November 21, 1997

Mr. Mark L. Feidler  
President, Interconnection Services  
BellSouth Telecommunications, Inc.  
675 West Peachtree St. N.E., Suite 4511  
Atlanta, Georgia 30375

Re: AT&T Digital Link

Dear Mark,

I am writing to express AT&T's dissatisfaction with BellSouth's cooperation on the EDI pre-Service Readiness Test (SRT) for AT&T Digital Link as well as the slow progress on Directory Listings negotiations for AT&T Digital Link. Unless we can quickly resolve these problems, the next step in our AT&T Digital Link market entry will be delayed. I will address the EDI pre-SRT problems first.

Our initial EDI negotiations for AT&T Digital Link were successfully concluded in late June 1997. In order to assure that there was total agreement on the EDI mapping, on June 16, 1997, AT&T requested that BellSouth review an AT&T Digital Link eye chart that resulted from the negotiations. Per the negotiations, the eye chart contained a REFNUM in both the Directory Listings section as well as the Local Number Portability section. After reluctantly agreeing to review the eye chart, BellSouth's voice mail response from Marcia Moss on June 26, 1997, did not indicate any problems with REFNUM.

In order to further ensure that potential mapping problems were ferreted out early in the process, AT&T sent to BellSouth on August 25, 1997, three test case scenarios to be reviewed. On September 17, 1997, AT&T received BellSouth's response to the test case scenarios. Although BellSouth's response did point out certain problems, the response once again did not point out that BellSouth expected to receive a REFNUM in one section only. Nor did BellSouth indicate that populating an 'S' (meaning 'same no change') in the TBE field was a problem when an activity type of 'V' (meaning 'migrate as specified') was requested.

Please examine one of the test scenarios which is attached. REFNUM clearly appears twice. And 'S' in the TBE field appears with the activity code of V elsewhere on the

order. If there was a problem, why was it not raised in September or earlier? Even though BellSouth's current position on the TBE field is counter to our original agreement and has been taken at the eleventh hour, we have determined that AT&T can implement a last minute systems change to meet your new requirements for this field. As regards REFNUM, however, we ask that you honor our original mutual agreement, i.e., that you accept AT&T Digital Link orders in which REFNUM appears in both the Directory Listings and the Local Number Portability sections. Please affirm that you will do so as soon as possible and provide a date when we may re-test the affected AT&T Digital Link pre-SRT orders.

I would now like to address the AT&T Digital Link Directory Listings problems we are currently experiencing. On November 7, 1997, AT&T sent questions to BellSouth on how to populate the data element charts for this portion of an order. These questions require immediate answer so that we can code our systems to properly provide this information on our AT&T Digital Link orders.

A call was held on November 8, 1997 in which BellSouth agreed to provide responses by November 12, 1997. In addition, a follow up call was set on the 8th for November 17, 1997. AT&T did not receive BellSouth's promised responses until late Friday, November 14, 1997. Although the call scheduled for November 17, 1997 took place, BellSouth was still not able to answer all of the questions originally posed. BellSouth was also unable to answer additional questions that arose on the call. A subsequent meeting for November 20, 1997 was scheduled. Once again, that meeting did not completely answer the outstanding questions.

Three remain unanswered. They relate to the fields associated with a listing-only order; which directory listing fields are required versus optional; and what tax exemption codes are applicable to certain REQTYPEs. Mark, we need your help in getting the right people to participate on the directory listing calls so that we can move ahead. Specifically, we need to close these remaining questions by close of business, November 24. This will allow us to proceed with coding without further delaying our schedule.

Members of your organization have complained from time to time about the effort within BellSouth required to close AT&T issues. These complaints, taken together with oversights and miscues like those cited above indicate that BellSouth has not yet provided the resources necessary to implement a fully functional ordering interface for AT&T Digital Link. We are hopeful that you will be able to correct this quickly.

Sincerely,

A handwritten signature in cursive script, appearing to read "R. G. Crafton".

R. G. Crafton

# AT&T Digital Link Electronic In' face Test Cases

Transmittal	Ref. #	Name Field	Field Description
	3.4.72	NET-STATE	Identifies the two character postal code of the state/province of the billing address associated with the billing name
	3.4.73	NET-ZIP CODE	Identifies the zip code or postal code of the billing address associated with the billing name
	3.4.74	NUMCON	Implementation Contact
	3.4.75	NUMCON-TEL. NO.	Telephone Number
	3.4.76	NUMCON-PAGER	Pager Number
	3.4.77	ALTIMCON	Alternate Implementation Contact
	3.4.78	ALTIMCON-TEL. NO.	Telephone Number
	3.4.79	ALTIMCON-PAGER	Pager Number
	3.4.80	DSGCON	Design/Engineering Contact
	3.4.81	GRG	Design Routing Code
	3.4.82	DSGCON-TEL. NO.	Telephone Number
	3.4.83	DSGCON-FAX NO.	Fax Number
	3.4.84	DSGCON-EMAIL	Business Mail Address
	3.4.85	DSGCON-STREET	Street Address
	3.4.86	DSGCON-FLOOR	Identifies the floor of the design/engineering contact's address
	3.4.87	DSGCON-ROOM / MAIL STOP	Identifies the room or mail stop of the design/engineering contact's address
	3.4.88	DSGCON-CITY	Identifies the city, village, township, etc. of the design/engineering contact's address
	3.4.89	DSGCON-STATE	State / Province
	3.4.90	DSGCON-ZIP CODE	Identifies the zip code or postal code of the design/engineering contact's address
	3.4.91	REMARKS	Identifies a free flowing field which can be used to expand upon and clarify other data on this form
End User Information (EUI) Form			
Administrative Section	SR STS-471672		
	3.2.1		
Location and Access			
	3.3.5	EU-NAME	End User Name (not listed name)
	3.3.6	EU-STREET1	Street (Must match ROAD)
	3.3.6	EU-STREET2	Street (Must match ROAD)
	3.3.7	EU-FLOOR	Identifies the floor of the end user location
	3.3.8	EU-ROOM	Identifies the room for the service address location
	3.3.9	EU-BLDG	Building
	3.3.10	EU-CITY	Identifies the city, village, township, etc. of the end user location
	3.3.11	EU-STATE	State / Province
	3.3.12	EU-ZIP CODE	Identifies the zip code or postal code of the end-user location
	3.3.13	LCN-NAME	Local Contact
	3.3.14	LCN-TEL. NO.	Identifies the telephone number of the local contact
	3.3.15	NUM	End User Number
	3.3.16	ACC	Access Information (VERY SPECIFIC)
Inside Wire 3.4			
	3.4.17	WNO	Inside Wiring Options
	3.4.18	WV-ACC	Inside Wire Billing Account Number
	3.4.19	WVCON-NAME	Inside Wire Contact
	3.4.20	WVCON-TEL. NO.	Inside Wire Contact Telephone Number
Billing Information 3.5			
	3.5.21	LCN-ACC	Local Billing Account Number (Main Account Number)
	3.5.22	PS	Post 99 Information
	3.5.23	BLNAME	Billing Name
	3.5.24	BLNAME	Secondary 99 Name
	3.5.25	BLNAME-STREET	Street Address
	3.5.26	BLNAME-FLOOR	Identifies the floor for the billing address associated with the billing name
	3.5.27	BLNAME-ROOM	Identifies the room for the billing address associated with the billing name
	3.5.28	BLNAME-CITY	Identifies city, village, township, etc. of the billing address associated with the billing name
	3.5.29	BLNAME-STATE	State/Province
	3.5.30	BLNAME-ZIP CODE	Identifies the zip code or postal code of the billing address associated with the billing name
	3.5.31	BLCON	Identifies the name of the person or office to be contacted on billing matters
	3.5.32	BLCON-TEL. NO.	Telephone Number
Disconnect Information	3.6		

PORT TO AT&T 3 DID NUMBERS FROM  
A BLOCK, 4048101228, 4048101221,  
4048101222

CHANGE DL

DISCONNECT PORTED PHONE  
NUMBER 4048101221

BAGS UNLIMITED  
1313 BAG AVE

BAGS UNLIMITED  
7 BAG AVE

BAGS UNLIMITED  
7 BAG AVE

BAGSVILLE  
GA  
1313131

BAGSVILLE  
GA  
1313131

BAGSVILLE  
GA  
1313131

4048108008

4048108008

4048108008

## AT&amp;T Digital Link Electronic Interface Test Cases

Transmittal	Ref. #	Name Field	Field Description
			P = Prohibited, R = Required, O = Optional, C = Conditional, M = Manual, N = Not applicable
Directory Listings / Services Data Elements		REFNUM	Reference Number
From RESALE SECTION		LHA	Line Activity
		LST	Listed Name Code
		LN	Listed Name
		LA	Identifies the listed address the subscribers desires shown in the directory.
		Listed Name Overflow	Overflow additional name information from the listed name field
		YPH	Yellow Page Heading Code
		Directory Book Code	Identifies the code of the directory that the subscriber is to be listed in if other than the home community book.
		WPQTY	Identifies the number of white page books desired by the subscriber.
		YPQTY	Identifies the number of yellow page books desired by the subscriber.
		DOA- Name	Identifies name(s) for delivery directories.
			Identifies the additional name(s) that directories are to be distributed.
		DOA- Name2	
		DOA- Address1	Identifies the additional address(es) for directory deliveries.
		DOA- Address2	Identifies the additional address(es) for directory deliveries.
		DOA- City	Identifies the City of the additional address(es) for delivery deliveries.
		DOA- State	Identifies the State of the additional address(es) for delivery deliveries.
		DOA- Zip Code	Identifies the Zip Code of the additional address(es) for delivery deliveries.
		SIC Code	Identifies the SIC code for the subscriber.
		ORDATE	Indicates that the subscriber's listing needs to be posted to the directory in advance of the directory closing date.
		ORDATE-CC	Indicates that the subscriber's listing needs to be posted to the directory in advance of the directory closing date.
Local Number Portability continues STS-47694			
Administrative Section 3.3			
Service Details 3.3	3.2.8	REFNUM	Reference Number
From RESALE SECTION		LHA	Line Activity
	3.2.9	TR	Telephone Number to Port
	3.2.9	TRP	Total Number of Ports
	3.2.10	CPN	Call Forward to Number
	3.2.11	SNP	Interim Number Portability Type
	3.2.12	RN	Route Initial
	3.2.13	SNPVS	Interim Number Portability Trust Group
	3.2.14	RELINQUISH	Toll Billing Exemption
	3.2.17	TCT OPT	Transfer of Call Options
	3.2.18	TCTO-PRIMARY	Transfer of Calls to Primary
		TCTO-SECONDARY	Transfer of Calls to Secondary
		TCTO-NAME-PRIMARY	Transfer of Calls to Primary Name
		TCTO-NAME-SECONDARY	Transfer of Calls to Secondary Name
		TCPRLOC	Transfer of Calls Period Century Code
	3.2.19	TCPRDATE	Transfer of Calls Period Date

0001	0001	001
C	C	O
LN	LN	
BAGS UNLIMITED	BAGS UNLIMITED	
7 BAG AVE. BAGSVILLE, GA 1313131	8 BAG AVE. BAGSVILLE, GA 1313131	

BAGS	BAGS
------	------

1234	1234	1234
970830	970830	970830

19	19
----	----

0001	0001
V	C
4048101221	4048101221
	4048101221

C	C	C
123		

S
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Michael Cruz  
AT&T  
Vendor Management  
1200 Peachtree St.  
Room 12N17  
Atlanta, Ga. 30309

November 14, 1997

Michael,

In response to your letter regarding questions on Caller ID Class of Service.

QUESTIONS:

1. In Georgia, the correct USOC for flat rate service is 14R. One would assume based on the verbal description that BellSouth provided, if a customer ordered flat rate service with Caller ID in Georgia, BellSouth would expect to see the USOC '14RCL.' However, in LEO, there is not any such USOC listed. Was this USOC 14RCL inadvertently omitted from LEO? What USOC does BellSouth expect to see for this situation?

Answer:

You are correct, use "14RCL" as the USOC.

2. In Georgia, measured rate service is a 5 character USOC. If a customer in Georgia orders measured rate service and Caller ID, should AT&T send the regular 5 character USOC or should we drop the last two characters of the normal USOC and replace them with 'CL'? The verbal description would indicate that we should send the normal USOC since it is 5 characters, but we need to verify this.

Answer:

Use the normal five (5) character USOC.

3. Does this rule also apply to Remote Call Forwarding (local and non-local) since it is also treated as a facility? Or, since it would be rare (or maybe even prohibited) to order Caller ID with Remote Call Forwarding, does the 'CL' rule not apply to Remote Call Forwarding?

Answer:

Remote Call Forwarding is a component of the switch, therefore it cannot have Caller ID Service. Remote Call Forwarding is a service without the ability to provide Caller ID Service.



4. For Georgia customer who order Complete Choice service, normally 3 USOCs are required:
- VR3
  - VSB
  - 14R

If a Georgia Complete Choice customer orders caller ID, which of the USOCs associated with Complete Choice Service require a 'CL' to be appended? LEO shows a valid USOC of 'VR3CL' but no valid USOC of VSBCL or 14RCL.

Answer:

VR3 and 14R are Basic Classes of Service, therefore they would require the "CL" designation.  
Ex. VR3CL & 14RCL.

VSB is not a Basic Class of Service and should not have the "CL" designation.

If you have any additional questions or concerns regarding this matter, please contact me at (770) 492-7548.

Sincerely,

Gary Romanick

Linda & Adilah:

RE: Our question to BST - Please explain what Service/Feature, these particular Casual Use Restrict Blocking FIDs restrict.

BellSouth is still investigating the following Restrict Casual Use Features. I advised BST yesterday, that I would escalate if we did not receive an answer today. This particular issue was referred to BST on 11/5.

11/21 -Cheryl Richardson of BST, provided the following response, however she will confirm by COB today. Cheryl, stated that BST did not have this information clearly documented, therefore their SME must research and document for all CLECs.

- 1.CIDS (Call Identity Delivery and Suppression) - BST is still investigating
- 2.CNAB (Call Number Delivery) - Caller ID for switch type 1A
- 3.CND (Call Name Delivery) - Caller ID
- 4.CNDB (Call Number Delivery) - Caller ID for switch type DMS
- 5.DARCW (Distinctive Alreting/Call Waiting) - BST is still investigating

If any questions, please call X4932

Beverly

**From:** Valencia, Wilma V.  
**Sent:** Monday, November 10, 1997 10:56 AM  
**To:** 'Stockton, Debra/BST'; 'Garvin, Margaret/BST'  
**Cc:** Simmons, Beverly; Davenport, Gwen; Stanley, Milford; Cruz, Michael V; Norris, Sharon/Iga; 'Burris, Jan'  
**Subject:** NC Issues for BellSouth

Margaret/Debra,

We need to have the following questions clarified. Please forward to the appropriate parties in your company.

1) **Call Waiting Deluxe with Conferencing (CWDC):** CWDC is not tariffed and not in the LEO Guide, but it is available in PSIMS. Once again, is this feature available in NC and if so, what is the appropriate USOC?

2) **Call Forwarding - Don't Answer Ring Control (CFDARC):** CFDARC is tariffed and in the PSIMS data, but is not listed in the LEO Guide. Is this feature available in NC, and if so, what is the appropriate USOC?

3) **Link-Up Carolina (Lifeline):** BellSouth's tariff states that customers receiving Aid for Families with Dependent Children (AFDC), Supplemental Security Income (SSI), or Food Stamps are eligible for Link-Up service. However, the LEO Guide states the service is only available to customers receiving AFDC and SSI. Given that NC PUC Rule 9-6 states that Food Stamp recipients should be eligible, it appears that the LEO Guide is inaccurate. We need BellSouth to resolve this discrepancy.

I would appreciate a response by noon on Thursday, 11/13/97.

Thanks,  
Wilma V. Valencia

FYI-

I work with Milford Stanley and will be working with Beverly Simmons on these and future issues.

Wilma,

Following are explanations to your questions to Margaret and Debra dated 11/10/97.

The first question had to do with Call Waiting Deluxe with Conferencing. You stated that CWDC is not in the tariff and not in the Leo Guide, but is available in PSIMS. Please keep in mind that the features listed in PSIMS are switch features and do not necessarily line up with the feature name in the tariff. However if you look at the tariff in A13.9.1.A.14 you will see under the description of call waiting deluxe call disposition options. The last option states that the user can "Conference the waiting call with the existing, stable call and, if desired, subsequently drop either leg of the "conferenced " call". The USOCs you would use for Call Waiting Deluxe are ESXD9 for use with customers who have the feature Call Forwarding No Answer and ESXDC for use with customers who do not have Call Waiting No Answer. To answer your question clearly: There is no Call Waiting Deluxe with Conferencing as such, but Call Waiting Deluxe will conference.

Your second question had to do with Call Forwarding Don't Answer Ring Control. You wanted to know if it was available in North Carolina because it was not listed in the LEO guide but it was in the tariff. You are right it is listed in the North Carolina tariff in A13.9.3.A.1.n. The USOC is GCJRC. The tariff should be considered the last word on whether or not a feature or service is available. I will submit this feature to the LEO team to be added in future issues.

Your Third Questions had to do with Link-Up Carolina. The general definition for Link-Up Carolina in the tariff under A4.7.1.A states that "It is intended to preserve and promote subscribership among low income households by providing a credit to the installation and connection charges applicable to the provisioning of residence service". The tariff further details the installation costs to be 50% of the installation charges or \$30.00 whichever is less under the tariff A4.7.1.B.c.1. The USOCs that LEO references are credits to be applied to the monthly bill. The USOCs for North Carolina are indeed ASGFA and ASGFS for the federal credits. Further, state credits apply and the USOCs for these credits are ASGSA and ASGSS. These credits are found in the tariff under A3.4.19.C.1&2. I will submit to the LEO team the addition of the state credits for North Carolina. Further, it should be noted that the Lifeline section in the LEO guide does not address Link-Up Carolina.

While LEO and PSIMS do a good job of answering many of your questions, the tariff should be considered as the ultimate source of what services or features are available in the states that BellSouth serves. Should you have any additional questions do not hesitate to contact me.

Greg Kirby

BellSouth Interconnection Services  
Suite 200  
1960 W Exchange Pl.  
Tucker, Ga. 30084  
Gregory.Kirby1@bridge.bellsouth.com

278



Beverly A. Simmons  
Negotiations & Implementation Manager

Room 12N08  
Promenade II  
1200 Peachtree St. NE  
Atlanta, GA 30309  
404 810-4932

November 5, 1997

Mr. Melvin Porter  
5147 Peachtree Industrial Blvd.  
Atlanta, GA 30341

Dear Mel:

This letter concerns USOC TTR (Touch Tone), that is being transmitted by AT&T in the Feature Detail section of the (LSR) Local Service Requests, and the interim solution implemented by BellSouth on October 23, 1997 to process these particular requests.

AT&T, will do a system change so that the USOC TTR is not transmitted. However BellSouth's interim agreement to process these requests, is not being performed 100% of the time by LCSC (Local Carrier Service Center) representatives. I have discussed this particular concern with you and Gloria Burr of BellSouth on previous occasions, most recently November 3, 1997. You requested that AT&T provide examples, but because BellSouth's representatives are faxing the clarifications to AT&T, you already have them. In spite of that, I will provide examples of those orders dated later than October 23, 1997, that have not been processed under your interim process arrangement. Please confirm, that BellSouth will continue to process these particular orders until AT&T can make system modifications so that the USOC TTR is no longer transmitted.

AT&T's mapping requirements are based on LEO (Local Exchange Ordering) Implementation guide Phase II issue 4 volume 2 dated July 1997, the Touch-Tone tab, page 3 section 2.2. That portion of your LEO guide states that the order requirements for Touch-Tone service vary in each state as follows: Florida, South Carolina are automatically provisioned with the residence basic telephone service and there is no negotiation of Touch-Tone; TTR remains a valid USOC but is not normally shown on residence service; TTB continues to be used for business services. The matrix on page 5 indicates that the USOC TTR for Florida is "X", which mean that it is applicable.

The LEO Implementation documentation continues to the source of erroneous and misleading information. AT&T requests, that BellSouth review the LEO guide for accuracy to eliminate or at the very least minimize the number of system changes we are required to make to adjust to processes that are not accurately described.

Please provide a written response by November 13, 1997.

Sincerely,

A handwritten signature in cursive script, appearing to read "Beverly Simmons".  
Beverly Simmons

Team:

10/21/97, Gloria Burr of BellSouth, provided the following information on Call Waiting Deluxe.

1. As of 10/15/97, Call Waiting Deluxe IS NOT available in a DMS 100 switch in Georgia.
2. USOC ESXD9 is used when the customer has Call Forwarding Don't Answer on their record. This particular USOC is not in LEO under Custom Calling Services.
3. USOC ESXDC is used with Call Waiting Deluxe with Conferencing.

BellSouth is providing the above information to me in writing.

Parity - the BellSouth representative is issuing the BellSouth order in DOE (Direct Order Entry) system, DOE has up front edits built in. If the BellSouth representative enters an invalid USOC, DOE will not allow the representative to move to the next screen until the error is cleared. Once the order is completed (ready to enter), DOE will not allow order generation to another system if there are any errors present on the order. We're not at parity.

If any questions, please call me 404-810-4932.

Beverly Simmons

Beverly Simmons

261

AT&T  
Promenade II  
Room 12N08  
1200 Peachtree St., NE  
Atlanta, GA 30309  
404 810-4932  
FAX: 404 810-3131

October 24, 1997

Gloria Burr  
BellSouth Interconnection Services  
675 West Peachtree St., NE  
Atlanta, GA

Dear Gloria:

This letter concerns Call Waiting Deluxe, and the previous discussions on whether or not this feature is available in a DMS 100 Central Office in Georgia. We also have some questions concerning Caller ID Class of Service, and whether Call ID Class of Service applies to all versions Caller ID service features.

Gloria, on October 21, 1997, you provided a verbal response, that is listed below, (BellSouth is expected to respond in writing).

1. As of 10/15/97, Call Waiting Deluxe is obsolete, this feature is not available in a DMS 100 Central Office in Georgia.
2. USOC ESXD9 is used when a customer has Call Forwarding Don't Answer on his account. This particular USOC is not in LEO (Local Exchange Ordering) Phase II volume 2 Implementation guide dated July 1997.
3. USOC ESXDC is used with Call Waiting Deluxe with Conferencing.

Based on the above information you have provided, we have the following questions:

1. Call Waiting Deluxe, USOC ESXDL is not available in Georgia. Is this feature available in Florida, and North Carolina ?
2. Since USOC ESXD9 is used when a customer has Call Forwarding Don't Answer on his account, and USOC ESXDC is used when a customer has Call Waiting Deluxe with Conferencing, is BellSouth, expecting AT&T to send USOCs ESXD9 and ESXDC as standalone USOCs, or send with any other feature ? This question applies to order requests for Georgia, Florida, and North Carolina.
3. AT&T built capabilities based on requirements in the LEO Implementation guide, which did not include USOC ESXD9. Therefore, AT&T cannot currently transmit USOC ESXD9. Since the LEO Implementation guide Phase II Volume 2, did not include this particular USOC, AT&T is requesting, that BellSouth accept USOC ESXDC, until we can modify systems to transmit USOC ESXD9.

On September 26, 1997, during the SRT (Service Readiness Testing) status call, Martha Romano of BellSouth, stated CL (Caller ID Class of Service), must precede the USOC, if the USOC is less than 5 characters. Currently, in Georgia there is an interim solution in place to process orders, missing CL (Caller ID Class of Service). AT&T is requesting, BellSouth implement the same interim solution for Florida orders, until we can modify our systems to transmit CL (Caller ID Class of Service). However, in order for AT&T to finalize these requirements, we have the following question which applies to three states, Georgia, Florida, and North Carolina. Does the CL (Class of Service) apply to all versions of Caller ID, for instance Caller ID with name, and Caller ID with Anonymous Call Rejection ?

Please provide a written response by Tuesday, October 28, 1997.

Sincerely,

  
Beverly Simmons

Mike,

Here is the response from BellSouth on your LEO vs. Tariff discrepancies.

Michael

---

**From:** Gloria.Burr1@bridge.bellsouth.com  
**Sent:** Monday, October 13, 1997 7:54 PM  
**To:** Cruz, Michael V, NLIAM  
**Subject:** calling number blocking

see attached

Thanks,



CNOB.doc

Burr



## CALLER ID BLOCKING QUESTIONS

1. In South Carolina, the Calling Number Delivery Blocking Permanent (NOB) is only available for Special Agencies and Law Enforcement as indicated in the tariff. (referred to the LEO guide coordinator as a discrepancy)  
The USOC in the tariff is NOBPC for residential and business customers.
2. You are correct the Kentucky does indicate that Calling Number Delivery Blocking for Non-pub listings is only available for residential customers. (referred to the LEO guide coordinator as a discrepancy)
3. Calling Name/Number Blocking per line(non agencies) and Calling Number Delivery Blocking -Permanent- per line Chargeable may not be the same features. It depends on how the PSC has allowed BellSouth to implement the service. The tariffs provide an a description under the "Definition of Service Offerings" for all products and service offered by BellSouth. Each state may offer and provisionBellSouth services differently. The South Carolina tariff states that all general public customers are charged, non-published and non-list customers are free.
4. You are correct, the LEO guide does not show the USOC NOBNP for calling Number Deliver Blocking Permanent per line (non-pub customers) (referred to the LEO guide coordinator as a discrepancy).

RECEIVED OCT 21 1997

(249)

Beverly Simmons

AT&T  
Promenade II  
Room 12N08  
1200 Peachtree St., NE  
Atlanta, GA 30309  
404 810-4932  
FAX: 404 810-3131

October 20, 1997

Gloria Burr  
BellSouth Interconnection Services  
675 West Peachtree St., NE  
Atlanta, GA

Dear Gloria:

This letter concerns the availability of the feature Call Waiting Deluxe, and whether this feature is available in Georgia in a DMS 10 Central Office. We have had several previous discussions on the availability of this feature. On September 30, 1997, BellSouth provided us with documentation indicating this feature is available for ordering in Georgia in a DMS 10 switch. However, AT&T has verified through BellSouth's P/SIMS (Products and Services Information Management System) data file, that this particular feature is not available in a DMS 10 switch in Georgia.

As a follow up to my telephone message on Thursday, October 16, 1997, AT&T requests, that BellSouth validate the P/SIMS data file provided to us for accuracy.

Please provide a response no later than Tuesday, October 21, 1997.

Sincerely,

  
Beverly Simmons

cc: Margaret Garvin  
Natasha Ervin

October 2, 1997

Beverly Simmons  
AT&T  
Promenade II Room 12N08  
1200 Peachtree ST. NE  
Atlanta, GA. 30309

Beverly,

This is a follow up letter from our September 29, 1997 conversation where I provided you BellSouth's response to your September 25 letter regarding tandem switching and suspension and restoral of service.

**Tandem Switching:**

**Question:** If a customer requests a feature that is not available in their LSO, will BellSouth provide tandem switching so that the customer can be provided the feature ?

**Answer:** No.

If a customer is interest in a particular feature and the central office is scheduled for a conversion, would BellSouth move up the availability date to meet a customer request to have the service now ?

**Answer:** No.

**Suspend/Restore Service:**

AT&T was advised that service suspension of a line applies to both local and toll is that correct ?

**Answer:** Yes.

Does BellSouth offer different levels of suspension ? Example: Request toll calls be denied by the local switch for a particular subscriber ?

**Answer:** To restrict toll calls for a subscriber, you would use one of the customized code restrictions.

Does Quick Serve Service for E911 apply with service suspension ?

**Answer:** A Quick Serve Service Line has E911 and these lines are not suspended.

What is the announcement message a caller hears if he/she calls a Quick Serve Service line ?

**Answer:** The number you have dialed is not available for incoming calls.

I consider these issues closed as of September 29, 1997.

Sincerely,

*[Signature]*

Beverly Simmons  
AT&T  
Promenade II  
1200 Peachtree ST. NE  
Room 12N08  
Atlanta, GA. 30309

October 2, 1997

Beverly,

On September 30, 1997 I provided you BellSouth's response to your September 24 letter. This letter is just a follow up to that conversation.

Question - Is the Ringing Pattern switch dependent as indicated on the matrix in the LEO guide dated 4/97 or can the customer select the Ringing Pattern as indicated in the LEO guide dated 7/97 ?

Answer: The Ringing Pattern is switch dependent, however your customer can select from the choices available.

Question - Is the GOER FID used in all central offices ?

Answer: No, only in the EWSD Office.

Question- If the customer makes a change to remove Call Forwarding - would AT&T resend Custom Ring USOC with the FID hanging off ?

Answer: AT&T only needs to send the feature/USOC being removed.

IF AT&T were to send the PIN/PID associated with Remote Call Forwarding, would BellSouth accept this or would BellSouth override this during the issuance of the service order ?

Answer: BellSouth will over ride AT&T's request during the service order issuance.

I consider these issues closed as of September 30, 1997.

Sincerely,

*Gary Romanick*

Gary Romanick

#1  
**Notification To CLEC on Suspended Service**

**RESIDENCE:**

**For Alabama , Florida , Mississippi and Louisiana:**

When the maximum time period ( see below) is reached a mechanized restoral for billing is sent to the billing department and CRIS restores the account for billing only. The line will remain suspended and CRIS will automatically bill the customer full rate until the next calendar year. The rate is then reduced back to the suspended rate for the maximum time period (see below). The full rate/suspended rate is repeated until the customer restores his service.

**Maximum Months**

9 months in a calendar year	6 months in a calendar year
Alabama	Louisiana
Florida	
Mississippi	

**For North Carolina, South Carolina and Georgia:**

When the maximum time period of six months is reached a mechanized restoral for billing is sent to the billing department and CRIS restores account for billing only. The line will remain suspended and CRIS will automatically bill the customer full rate for the next 6 months. Then the rate is reduced back to the suspended rate for the maximum of months. The full rate/suspended rate is repeated until the customer restores his service.

**BUSINESS:**

**For Alabama , Florida , Georgia, Mississippi and Louisiana:**

When the maximum time period is reached (see below) a mechanized restoral for billing is sent to the billing department and CRIS restores the account for billing only. The line will remain suspended and CRIS will automatically bill the customer full rate until the next calendar year. Then the rate is reduced back to the suspended rate for the maximum of months. The full rate/suspended rate is repeated until the customer restores his service.

- **Florida:** Some of the vertical services will not be billed a monthly charge during the period of suspension.

**Maximum Months**

9 months in a calendar year	6 months in a calendar year
Alabama	Florida
Mississippi	Georgia
	Louisiana

**For North Carolina and South Carolina:**

When the maximum time period of 6 consecutive months is reached a mechanized restoral for billing is sent to the billing department and CRIS restores account for billing only. Comptrollers sends a referral to the Service Center and a R order is issued to restore service for billing only. After 6 months an order should be issued to reduce rate back to half rate.

Beverly Simmons

AT&T  
Promenade II  
Room 12N08  
1200 Peachtree St., NE  
Atlanta, GA 30309  
404 810-4932

September 24, 1997

Margaret Garvin  
BellSouth Interconnection Services  
1960 West Exchange Place  
Tucker, GA 30084

Dear Margaret:

This letter outlines some outstanding questions concerning the ordering process that we have been trying to resolve since May 2, 1997.

There are several questions concerning the LEO Guide and information which seems to be incorrect in the guide or not included at all. We have several questions about ordering Custom Ring.

Question - Is the Ringing Pattern switch dependent as indicated on the matrix in the LEO guide dated 4/97 ? or Can the customer select Ringing Pattern as indicated in the LEO guide dated 7/97 ?

Current process for Custom Ring service in conjunction with Remote Call Forwarding:  
Custom Ring 1 & 2 - AT&T is sending FD (Feature Detail) of 'All' to call forward TNs 1 & 2.  
Custom Ring (main number) - AT&T is sending FD (Feature Detail) of 'Main' to call forward main TN only.

Interim Process: BellSouth will accept FD of 'All', and write order with 'GOER' FID.

BellSouth will accept FD of 'Main' and write order with MCIF FID.

Note: On 9/15/97 Pat Rand indicated that the GOER FID was used for central office EWSD only.

Question - Is the GOER FID used in all central offices ?

Question - If the customer makes a change to remove Call Forwarding - would AT&T resend Custom Ring USOC with FID hanging off ? or send Custom Ring USOC without FID ?

What are the EDI labels when there's Feature Detail ? Do we include a virgule or a space ?

Remote Call Forwarding - PIN/PID Number - In Phase I BellSouth is assigning PIN/PID, and returning it in retained remarks on 865 completion transaction. BellSouth is indicating there's a security issue when providing PIN/PID in retained remarks.

Waiting for response -Pat Rand was going to verify the service order edit system to make sure that BellSouth wouldn't change the PIN/PID number if AT&T provided it.

If AT&T agrees to provide the PIN number, we would send on the initial order (850). If a customer calls AT&T to reset their PIN number, AT&T would call BellSouth as opposed to issuing a service order. We can't implement a process for PIN/PID until these questions are answered.

Please provide a response no later than September 25, 1997.

Sincerely,

A handwritten signature in cursive script, reading "Beverly Simmons". The signature is fluid and elegant, with a long, sweeping underline that extends to the right.

Beverly Simmons

Date: November 4, 1997

To: Gloria Burr

From: Beverly Simmons

Total number of pages including cover: 3

Comments: Attached, letter dated September 24, 1997, concerning Remote Call Forwarding for the first and second additional telephone numbers of Custom Ring service (Ringmaster).



MODE = TRANSMISSION

START=NOV-04 10:07

END=NOV-04 10:09

NO.	COM	ABBR/NTWK	STATION NAME/ TELEPHONE NO.
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\*\*\*\*\* ( FAX-950 01.24)\*\* -

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**July 11, 1997**

**To: Milford Stanley, AT&T LIAM  
Margaret Garvin, BellSouth Account Team**

**From: Mike Lacy, AT&T Product Management**

The following are some of questions we have as we become more familiar with the BellSouth states tariffs and the LEO guide:

1. How do we order Flat Rate Business Service in North Carolina? The LEO guide indicates FLAT RATE Business service has a USOC of 1FB (also the class of service for POTS per Martha Romano) however when we look at the tariff it does not show 1FB, instead it shows PBC and PCE. In addition there are 38 local exception in North Carolina that are mandatory (i.e. look like their own little rate center). We have coded to order a Flat Rate Business Line with only the Class of Service code of 1FB. That is how we want to order Flat Rate Business service in all BellSouth States. If BellSouth uses special USOC's for the Local exceptions and otherwise, we assume BST will do the appropriate translations for their order system.
2. How do we order Flat Rate Business Service in Tennessee? The tariff shows no USOC for this service and the LEO guide showed 1FB until the last LEO update and the 1FB USOC has disappeared for Tennessee. We have the same need as described above for North Carolina.
3. What is the correct USOC for Combo and Outward PBX trunks in Alabama? The LEO guide shows TFC for Combo and TFU for Outward, but the tariff shows TFC for Combo and Outward.
4. In Louisiana , please explain how the Local Exception differentials work?
5. In Ms, La, and NC the Touchstar features indicate a USOC for the first feature and a different USOC for the second and all additional features at a location. We will be ordering features using the TCIF Service Feature Codes which make no such distinction. Again we are assuming BST's systems will do the proper translation for the appropriate USOC. Please confirm?
6. Call Trace Per Use in North Carolina. The tariff indicates a USOC for Denial of Per USE activation but the LEO guide only shows in the LEO guide Denial of Per Use Activation is only shown for Mississippi.  
Is Per Use of Call trace offered in North Carolina?

These are the first few questions we have. I am sure we will have many similar questions as we become more familiar with the LEO Guide. What will be the quickest most efficient way to get these kind of questions answered?

BellSouth Interconnection Services

Facsimile

From  
Department  
Address

*Jo Sundman*  
AT&T Regional Account Team  
1960 West Exchange Place  
Suite 200  
Tucker, GA 30084

Telephone number  
Fax number

770-492-~~3349~~ *492-7582*  
770-492-9412

To

*Mike Lacy*

Telephone number

*404-810-8573*

Fax number

*404-810-8477*

Comments

*Tauff and LEO Guide discrepancies*

If this fax is not received in good order, please contact the sender listed above.

Date

*8/18/97*

Total number of pages

*2*

August 19, 1997

To: Mike Lacy, AT&T Product Management

From: Jo Sundman  
BellSouth  
System Designer

This letter is to respond to your letter of July 11, 1997, regarding discrepancies between state tariffs and the LEO guide.

Question 1: The LEO guide is correct. 1FB is the USOC / Class of Service for Flat Rate Service. PBC is not Flat Rate Service. It is Community Calling Plus, Complex without Inward Call Billing. PCE is also not Flat Rate Service. It is Community Calling Plus, Simple without Inward Call Billing (there is a typo in the description -- "wimple" should read "simple" --which will be corrected in the next issue of Volume 2). If you want to order Flat Rate Business, order it as a 1FB.

Question 2: The LEO guide has an error regarding the availability of Flat Rate service. 1FB is available in Tennessee. This error will be corrected in the next issue of Volume 2.

Question 3: TFC is the correct USOC for Combo Trunks and TFU is the correct USOC for Outward only trunks in Alabama. TFC is referred to as Combo because it is a combination of both Inward and Outward service. If you are ordering Combo PBX Trunks in Alabama you would order as TFC.

Question 4: We need more detail and elaboration here as to what you are asking for in Local Exception differentials.

Question 5: The SME's want to investigate this question further.

Question 6: Call Trace - Denial - Per use is available in North Carolina.

If you can please give us more detail for Question 4 we can then clear up that issue and as soon as the SME's respond fully on Question 5, I will forward that to you as well.

We apologize for any inconvenience errors in the documentation may have caused and will be correcting them in the next issue of the LEO Guide. If you have any other questions that come up please feel free to call me (770-492-7582) or fax me (770-492-9412).

August 21, 1997

To: Jo Sundman  
BellSouth  
System Designer

Fr: Stephanie Harris  
AT&T Local Services Organization

Re: Tariff and Leo Guide Discrepancies

Per your request on a letter to Mike Lacy dated 8/19/97, below you will find clarification to "Question 4" regarding exception differentials in Louisiana. Also, we have some additional questions regarding the LEO guide and the BellSouth tariff.

- Clarification for Question 4: The Louisiana BellSouth tariff A3.2.7 Exception Rate Exchanges lists 8 groups and their differential. Please confirm our understanding of how the differential is applied. For Example: Angie is listed in R.G 6 (Tariff A3.7.1) and has a Group Differential of 3 (Tariff A3.2.9). Based on our understanding the R.G that applies to Angie would then be 9.
- In the BellSouth LEO guide (Issue Date : 7/97, Issue: 4, Volume 2 of 3) the Call Blocking section page 6 lists CREX6 as not available in GA. Tariff A12.20.3 lists CREX6 as option 6 for GA. Please explain the discrepancy.
- In the BellSouth LEO guide (Issue Date : 7/97, Issue: 4, Volume 2 of 3) the Call Blocking section lists several options available in GA that are not found in the GA tariff (A13.20.2 lists the GA custom code restrictions options CREX1, CREX2, CREX3, CREX4, CREX6). Where can we find the others in the tariff?

Example: 1) The LEO guide page 6 lists CREXC restricts calls to 900 service available in GA. 2) The LEO guide page 6 lists CREXV available in all states with no description. 3) The LEO guide page 7 lists CREXX and CREXY available in GA, but not found in the tariff.

Please call me at 404-810-2052 if you have any questions.

PRODUCT ORDERING GUIDE

**BELLSOUTH**  
Issue Date: July 1997  
Issue: 4  
Volume 2 of 3

CALL BLOCK SERVICE USOCs												
USOC	DESCRIPTION	AL	FL	GA	KY	LA	MS	NC	SC	TN	TARIFF	REF
	DENIES ACCESS TO: 0, 10XXX+0, 00, 0+, 10XXX+0+, 1+, 10XXX+1+, 1+555-1212, 1+NPA+555-1212, 411, 1+411, 0+411, 1+900, 976, 1+976, 011+, 01, 500 SERVICE	X	X		X	X	X	X	X	X	A13	
CREX1	DENIES ACCESS TO 976 SERVICE, 1+976, 0, 10XXX+0, 00, 0+, 10XXX+0+, 01	X	X		X	X	X	X	X	X	A13	
CREX2	DENIES ACCESS TO 0, 10XXX+0, 00, 0+, 10XXX+0+, 1+, 10XXX+1+, 1+555-1212, 1+NPA+555-1212, 1+900, 011+, 01+	X	X		X	X	X	X	X	X	A13	
CREX3	DENIES ACCESS TO 976 SERVICE, 1+976, 1+900, 0+900	X	X		X	X	X	X	X	X	A13	
CREX4	DENIES ACCESS TO N11 SERVICE, 1+900, 0+900, 976, 1+976	X	X		X	X	X	X	X	X	A13	
CREX6	SHOULD ONLY BE USED IF THE CUSTOMER SPECIFICALLY REQUEST THE SERVICE OUT OF THE ACCESS TARIFF. INTERNATIONAL CALL BLOCKING AND 900 TYPE PAY PER CALL BLOCKING											
CREX9	DENIES ACCESS TO: 0, 10XXX+0, 00, 0+, 10XXX+0+, 1+, 10XXX+1+, 1+555-1212, 1+NPA+555-1212, 411, 1+411, 0+411, 1+900, 976, 1+976, 011+, 01, 500 SERVICE	X	X		X	X	X	X	X	X	A13	
CREXA	DENIES ACCESS TO: 0, 10XXX+0, 00, 0+, 10XXX+0+, 1+, 10XXX+1+, 1+555-1212, 1+NPA+555-1212, 1+900, 011+, 01, NON- OPTIONAL CHARGED CALLS TO THE EXPANDED LOCAL CALLING AREA											
CREXB	RESTRICTS CALLS TO: 900 SERVICE	X	X		X	X	X	X	X	X	A13	
CREXC	RESTRICTS CALLS TO: 900 SERVICE ON ESX@ SERVICE	X	X		X	X	X	X	X	X	A13	
CREXD	DENIES ACCESS TO 976, 1+976	X	X		X	X	X	X	X	X	A13	
CREXV	RESTRICTS CALLS TO:	X	X		X	X	X	X	X	X	A13	

crex 5

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w/andell

PRODUCT ORDERING GUIDE

CALL BLOCK SERVICE USOCs												
USOC	DESCRIPTION	AL	FL	GA	KY	LA	MS	NC	SC	TN	TARIFF	REF
	DENIES ACCESS TO 976 SERVICE, 1+976, 0, 10XXX+0, 00, 0+, 10XXX+0+, 01, INTERNATIONAL CALL BLOCKING	X	X	W	X	X	X	X	X	X	A13	
CREXW	DENIES ACCESS TO 976 SERVICE, 1+976, 1+900, 0+900, INTERNATIONAL CALL BLOCKING	X	X	X	X	X	X	X	X	X	A13	
CREXX	DENIES ACCESS TO N11 SERVICE, 1+900, 0+900, 976, 1+976, INTERNATIONAL CALL BLOCKING+810	X	X	X	X	X	X	X	X	X	A13	
CREXY	DENIES ACCESS TO 976, 1+976, INTERNATIONAL CALL BLOCKING	X	X	X	X	X	X	X	X	X	A13	
CREXZ	SELECTIVE CLASS OF CALL SCREENING DENIES ACCESS TO 1+, 101XXX1+, 10XXX1+, 976, 900 SERVICE CALLS, PER CENTRAL OFFICE LINE, MULTISERV LINE, ESSX® SERVICE, DIGITAL ESSX®, OR MULTISERV PLUS, OR PBX TRUNK	X	X	X	X	X	X	X	X	X	A13	
SRG	SELECTIVE CLASS OF CALL SCREENING DENIES ACCESS TO 1+, 101XXX1+, 10XXX1+, 976, 900 SERVICE CALLS, PER ESSX® NAR	X	X	X	X	X	X	X	X	X	A13	
SRGBB	SELECTIVE CLASS OF CALL SCREENING DENIES ACCESS TO 1+, 101XXX1+, 10XXX1+, 976, 900 SERVICE CALLS, PLUS EXPANDED SERVICE AREA, PER PBX TRUNK	X	X	X	X	X	X	X	X	X	A13	
SRGBX	SELECTIVE CLASS OF CALL SCREENING DENIES ACCESS TO 1+, 101XXX1+, 10XXX1+, 976, 900 SERVICE CALLS, PLUS EXPANDED SERVICE AREA, PER LINE	X	X	X	X	X	X	X	X	X	A13	
SRGCO	SELECTIVE CLASS OF CALL SCREENING DENIES ACCESS TO 1+, 101XXX1+, 10XXX1+, 976, 900 SERVICE CALLS, PLUS EXPANDED SERVICE AREA, PER LINE	X	X	X	X	X	X	X	X	X	A13	



**PRODUCT ORDERING GUIDE**

CALL BLOCK SERVICE USOCs											
USOC	DESCRIPTION	AL	FL	GA	KY	LA	MS	NC	SC	TN	TARIFF REF
	SELECTIVE CLASS OF CALL SCREENING DENIES ACCESS TO 1+, 10XXX1+, PER CENTRAL OFFICE LINE, MULTISERV LINE, ESSX SERVICE, DIGITAL ESSX, OR MULTISERV PLUS, OR PBX TRUNK	X	X	X	X	X	X	X	X	X	A13
SRGM1	SELECTIVE CLASS OF CALL SCREENING ALLOWS ACCESS TO 1+, 10XXX1+, PER CENTRAL OFFICE LINE, MULTISERV LINE, ESSX SERVICE, DIGITAL ESSX, OR MULTISERV PLUS, OR PBX TRUNK	X	X	X	X	X	X	X	X	X	A13
SRGM2	SELECTIVE CLASS OF CALL SCREENING DENIES ACCESS TO 1+, 101XXX1+, 10XXX1+, 976, 900 SERVICE CALLS, PER TYPE 1 TRUNK	X	X	X	X	X	X	X	X	X	A13
SRGM3	SELECTIVE CLASS OF CALL SCREENING ALLOWS ACCESS TO 1+, 10XXX1+, PER TYPE 1 TRUNK	X	X	X	X	X	X	X	X	X	A13
SRGM4	SELECTIVE CLASS OF CALL SCREENING DENIES ACCESS TO 1+, 101XXX1+, 10XXX1+, 976, 900 SERVICE CALLS, PLUS EXPANDED SERVICE AREA, PER ESSX SERVICE NAR		X					X			A13
SRGNR	SELECTIVE CLASS OF CALL SCREENING DENIES ACCESS TO 1+, 101XXX1+, 10XXX1+, 976, 900 SERVICE CALLS, PLUS EXPANDED SERVICE AREA, PER ESSX LINE										
SRGPL	SELECTIVE CLASS OF CALL SCREENING DENIES ACCESS TO 1+, 101XXX1+, 10XXX1+, 976, 900 SERVICE CALLS, PLUS EXPANDED SERVICE AREA, PER ESSX LINE		X		X	X	X	X	X	X	A13

BellSouth Interconnection Services

Facsimile

From  
Department  
Address

*To Sundman* 492-7582  
AT&T Regional Account Team  
1950 West Exchange Place  
Suite 200  
Tucker, GA 30084

Telephone number  
Fax number

770-492-7550  
770-492-9412

To

*Stephanie Harris*

Telephone number

*404-810-2052*

Fax number

*404-810-8337*

Comments

*Stephanie,*

*Would you please fill out the*

*attached survey for me and*

*fax it back to me? Thanks! To*

If this fax is not received in good order, please contact the sender listed above.

Date

*9/29/97*

Total number of pages

*2*

September 29, 1997

To: Stephanie Harris  
AT&T Local Services Organization  
Phone: 404-810-2052  
Fax: 404-810-8337

From: Jo Sundman  
BellSouth Interconnection Services  
Phone: 770-492-7582  
Fax: 770-492-9412

Re: Tariff and LEO Guide Discrepancies

Stephanie,

This is in response to your letter of August 21, 1997, regarding Tariff and LEO guide discrepancies.

1) Clarification on Louisiana Tariff A3.2.7 Exception Rate Exchanges. Angie is listed as Rate Group 6 and has a Group Differential of 3. The Rate Group Angie would be in is 3 (subtract the differential).

2) CREX6. CREX6 is available in Georgia Tariff A13.20.3. The LEO guide will be updated to reflect this.

3) CREXC.V.X.Y. The Tariff reference I was given is F.C.C. No. 4, Section 13.3.13.

I have not been able to find this last tariff reference myself, but I am still looking. I wanted to go ahead and give this to you so you could have this in case you found it before I did!

Let me know if you have any questions.

Jo Sundman

# Memorandum

DATE: October 3, 1997  
TO: Michael Cruz  
FROM: Mike Duke  
RE: Calling Number Delivery Blocking as documented in  
BellSouth's LEO Guide  
CC: ~~Michael~~, D. Berger

Michael - I have compared the information on this feature in BellSouth's LEO Guide with BellSouth's tariffs and have found several discrepancies which need to be clarified with BellSouth. Specifically:

1. BellSouth's South Carolina tariff indicates that Calling Number Delivery Blocking - Permanent - per line is available to both residential and business subscribers under the USOC NOB, but this authority not shown in the LEO Guide.
2. BellSouth's Kentucky tariff indicates that residential subscribers who have non-pub listings may order Calling Number Delivery Blocking under USOC NOBNN, whereas the LEO Guide indicates that business subscribers may also order this feature.
3. The LEO Guide lists USOC NOBPC twice: (1) Calling Name/Number Blocking - per line (non agencies) and (2) Calling Number Delivery Blocking - Permanent - per line - CHARGEABLE. Are these the same feature, except in Georgia there is no charge and in South Carolina there is a \$2.00 charge? Or are they two different features? How can AT&T determine the difference? Also, the South Carolina tariff does not provide an explanation of the criteria for determining when to apply the charge. Finally, the LEO Guide indicates that both (1) and (2) above are available in South Carolina, while their tariff only shows the chargeable version.
4. BellSouth's Tennessee tariff indicates that Calling Number Delivery Blocking - Permanent - per line (non-pub listing customers) is available for residential and business subscribers with the USOC of NOBNP, but BellSouth's LEO Guide does not contain this USOC. Note: Calling Number Delivery Blocking - Permanent - per line (non-pub listing customers) is shown as available in Kentucky, but to residential subscribers only and with a different USOC.

It is critical that we clarify these discrepancies quickly in order to proceed with our process of documenting our business requirements for AT&T's systems development community. Please call me if you have any questions. Thanks.

*Mike*

# **Caller ID Blocking - Permanent - Per Line** **Comparison of BST's LEO Guide vs their Tariffs**

USOC/ FEATURE CODE	RES	BUS	DESCRIPTION	AL	FL	GA	KY	LA	MS	NC	SC
NOB	X	X	Calling Number Delivery Blocking - Permanent - per line	X	X	X	X	X	X	X	
NOBNN	X	X <sub>2</sub>	Calling Number Delivery Blocking - Permanent - per line (non-pub listing customers)				X <sub>2</sub>				
NOBPC	X	X	Calling Name/Number Blocking - per line (non agencies)			X				X	X <sub>1</sub>
NOBPP		X	Calling Number Delivery Blocking - Permanent - per line (non-pub & non-list customers) - NO CHARGE								X
NOBPC		X	Calling Number Delivery Blocking - Permanent - per line - CHARGEABLE								X
NOBNP <sub>1</sub>	X	X	Calling Number Delivery Blocking - Permanent - per line (non-pub listing customers)								

Footnotes: 1 BST's Tariff indicates that NOB is available in SC.

2 BST's Tariff indicates that NOBNN is only available to residential subscribers in KY.

3 BST's Tariff indicates that NOBPC is chargeable at \$2.00 in SC (Note that LEO Guide lists two NOBPC USOCs).

4 BST's Tariff lists this USOC, which is not even listed on LEO Guide.

Attachment 5  
TRA Docket 97-00309  
AT&T Response to  
Consumer Advocate Division's  
Second Discovery Request



Pamela A. Nelson

Room 12N54  
1200 Peachtree St. NE  
Atlanta, GA 30309  
404 810-3100

March 9, 1998

Ms. Jan Burriss  
BellSouth  
2nd Floor  
1960 West Exchange Place  
Tucker, GA 30084

Dear Jan:

A long standing BellSouth commitment from the Ordering Interface meetings we held late last year was delivery by February 27, 1998 of the directory listing business rules and EDI mapping rules required to implement the March 16, 1998 Electronic Ordering Interface Upgrade. As AT&T had clearly indicated, this documentation needed to be delivered at the latest in early December, when the EDI requirements for the March, 1998 Ordering Interface Upgrade were finalized. However, due to internal BellSouth constraints, the best date to which BellSouth could commit was February 27, 1998. BellSouth did not deliver the documentation on February 27, 1998. Linda Mull received a call advising her that the documentation would instead be available March 3, 1998. As of the close of business on March 3, 1998, BellSouth has still not delivered the completed documentation. In discussions with your team the evening of March 3, they advised that they were working the problem, but could not provide a committed delivery date.

At the Ordering Interface meeting on February 10, 1998, Peggy Caldwell and Eddie English both stated that they understood the importance of delivering the completed directory listing rules and EDI content documentation so that AT&T could incorporate these rules into its interfaces. Because BellSouth has not been forthcoming in providing this critical information, system coding has had to be done from notes taken at meetings in order to meet the March 16 upgrade. This information was also essential if we were going to have the "walk through" that Peggy Caldwell had suggested be held between her team and Mindy Diamond's team before the March 16, 1998 Ordering Interface Upgrade testing. This delay in receiving the documentation has obviously delayed the "walk through," increases the possibility of mismatched systems and likely will delay completion of the ordering interface upgrade.

This is but another example of the frustrating BellSouth delays and missed commitments that have plagued AT&T's efforts to implement changes to operating support systems (OSS) essential for AT&T to offer competitive local exchange telephone services. These delays and missed commitments by BellSouth have also increased AT&T's costs and contributed to customer dissatisfaction by delaying improvements in OSS that could reduce the number of rejected orders that AT&T continues to experience. Jan, we need this information now. Please advise me upon receipt of this letter as to when BellSouth will deliver this critical information.

Sincerely,

A handwritten signature in cursive script, appearing to read "Pamela A. Nelson".

Attachment 6  
TRA Docket 97-00309  
AT&T Response to  
Consumer Advocate Division's  
Second Discovery Request





BellSouth Interconnection Services  
Suite 200  
1980 West Exchange Place  
Tucker, Georgia 30084

770 492-7590  
Fax 770 492-0937  
Internet:  
Jan.Burris1@bridge.bellsouth.com

Jan M. Burris  
Sales Assistant Vice President  
AT&T Regional Account Team

February 23, 1998

Ray Crafton  
AT&T  
1200 Peachtree Street, NE  
Atlanta, GA 30309

Dear Ray:

The BellSouth position outlined in your letter to Scott Schaefer on February 13, 1998 is basically correct. BellSouth, at this time, has no plans to make available an electronic end to end process to order combined UNEs (or UNE-P). It is also BellSouth's position that BellSouth provides combined UNEs at a UNE billing rate only in Kentucky and in the Florida testbed. In the remainder of Florida and the other seven (7) states, UNE-Ps that mirror BST tariffed services are billed at the appropriate resale rate.

Let me outline for you the specifics in each of the three scenarios your letter addressed.

- With the implementation of the EDI-TCIF Issue 7 release, the "M" indicator (originally scheduled for the Issue 8 release) will be available. It will flag that the order is a UNE combination, and the actual ordering process in the LCSC will be manual.
- Paper orders for combined UNEs sent via facsimile to the LCSC will be accepted and processed manually.
- Neither the EDI PC based ordering system nor the LENS ordering vehicle are currently equipped to process loop/port UNE combination orders. There is no plan at this time to enhance these systems to make this electronic ordering ability available.

I hope this clarifies any questions you have. If not, please feel free to call me

Sincerely,

cc: Scott Schaefer  
Joe Baker  
Quinton Sanders



BellSouth Interconnection Services  
Suite 200  
1960 West Exchange Place  
Tucker, Georgia 30084

770 492-7580  
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Jan M. Burris  
Sales Assistant Vice President  
AT&T Regional Account Team

February 24, 1998

Ray Crafton  
Division Platform Manager  
AT&T  
4<sup>th</sup> Floor  
1200 Peachtree St., N.E.  
Atlanta, GA 30309

Dear Ray,

Thank you for your letter of February 20, 1998, outlining your request for specific switch information.

As we discussed in our Core Team meeting of February 11, 1998, we will provide the requested information in a limited number of switches to provide a basis for discussion of our path forward. At this point, the plan is to provide switch information on a 5E and a DMS100 in Atlanta with both residence and business capabilities, and on one switch in Macon. That information will be available for you no later than March 6, 1998.

Another alternative we might consider is AT&T providing a list of specific features it is interested in having, and we could then determine the best manner to provide those features to AT&T.

Please let me know if you have questions.

Sincerely,

Jan Burris

cc: Pam Nelson  
Quinton Sanders

Attachment 7  
TRA Docket 97-00309  
AT&T Response to  
Consumer Advocate Division's  
Second Discovery Request

**AT&T**

1200 Peachtree St. NE Rm. 1200J  
Atlanta, Georgia 30309

March 3, 1998

Valerie Gray  
BellSouth Account Team  
1960 West Exchange Place  
Suite 200  
Tucker, Georgia 30084

Dear Valerie:

I wanted to confirm our conversation yesterday concerning EDI-PC certification. Because of resource constraints within BellSouth, you asked that AT&T delay certification of EDI-PC until the EDI Issue 7 interface upgrade is complete. As you indicated, the same resources are required for both the upgrade and the certification, making both activities difficult to run concurrently. We do not want to do anything that could jeopardize the Issue 7 upgrade testing.

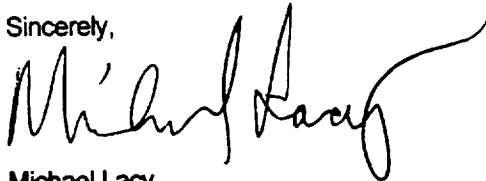
We also discussed whether Harbinger was bringing out an upgrade to the current EDI-PC version 2.0. I indicated it would be great if we could upgrade our PC while the certification is on hold. You said you would find out when we might begin such an upgrade. Will you please let me know as soon as possible when that software upgrade can be done? If we should work with someone directly at Harbinger please let me know.

In addition, can you estimate how long we might be on hold? We are expecting to be in testing on the interface upgrade through mid March. Should we expect EDI PC to be on hold through mid March? Is it feasible to get the new software in that time frame?

Please call me when you have information concerning the software upgrade.

Thanks for all your help.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Lacy", with a long, sweeping horizontal stroke extending to the right.

Michael Lacy  
AT&T Product Delivery Management

CC. Michael Duke, Sharon Norris